

TSD File Inventory Index

Date: June 6, 2000
Initial: CIM Menwad

Facility Name: <u>Bauden Chemical Inc. (Painting & Coatings - One Federal Site)</u>		
Facility Identification Number: <u>OHD 005 093 740</u>		
A.1 General Correspondence	✓	B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status	✓	.1 Correspondence
.1 Correspondence	✓	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	✓	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	✓	C.2 Compliance/Enforcement
.4 Financial Insurance (Sudden, Non Sudden)	✓	.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests	✓	.2 Import/Export Notifications
.6 Annual and Biennial Reports	✓	C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring	✓	D.1 Corrective Action/Facility Assessment
.1 Correspondence	✓	.1 RFA Correspondence
.2 Reports	✓	.2 Background Reports, Supporting Docs and Studies
A.4 Closure/Post Closure	✓	.3 State Prelim. Investigation Memos
.1 Correspondence	✓	.4 RFA Reports
.2 Closure/Post Closure Plans, Certificates, etc	✓	D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring	✓	.1 RFI Correspondence
.1 Correspondence	✓	.2 RFI Workplan
.2 Reports	✓	.3 RFI Program Reports and Oversight
B.1 Administrative Record	✓	.4 RFI Draft /Final Report

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	X
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	X
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments:

*Documents do not justify individual
for the new schedule*

**A.1 Public
Participation**

VERIFICATION OF RECEIPT OF PUBLIC REVIEW MATERIALS

NAME OF LIBRARY CONTACT, LIBRARY AND LOCATION:
Ohio Environmental Protection Agency-Northwest District
1035 Devlac Grove Road
Bowling, Green, OH 43402

ATTN: Ben Chambers

FACILITY NAME, LOCATION AND ID #:

- 1) Borden Printing Ink-6725 Glead St., Whitehouse, OH
- 2) PPG Industries, Route 30 & Lincoln Highway, Crestline, OH
- 3) Whirlpool, 4901 Main St., Findlay, OH
- 4) Continental Forest, 975 Glenn Street, Van Wert, OH

MATERIALS RECEIVED:

Closure materials and related background information
Public notice

DATE RECEIVED/MADE AVAILABLE TO PUBLIC: August 23, 1984

SIGNATURE OF RECEIVING PARTY: Katherine L. Wilson for Ben Chambers

PLEASE RETURN (IN SELF-ADDRESSED, POSTAGE AND FEES PAID, ENVELOPE) TO:

U.S. Environmental Protection Agency
5HW-13
230 S. Dearborn Street
Chicago, IL 60604

Attention: Christine Klemme

RECEIVED
WASTE MANAGEMENT
BRANCH

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: Dec. 6, 1982

SUBJECT: Borden Chemical Co.
ID# OHD005043749

FROM: Dianne Rowland, RAIU *DR*

TO: Elizabeth Utley, TPCS-STU #2
Files

This memorandum is to notify that the public comment period pertaining to Borden Chemical Company Printing Ink Division ended on December 6, 1982. No public comments were received concerning Borden's closure of a drum storage area of hazardous wastes at its facility at 6725 Gilead St. in Whitehouse, Ohio.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: Oct. 15, 1982

SUBJECT: Borden Inc. Closure Plan
ID# OHDO05043740

FROM: Dianne Rowland, RAIU *DR*

TO: E. Utley, Files

This memo confirms that a Public Notice concerning a closure plan for a drum storage area at Borden Chemical Co. Printing Ink Division, 6725 Gilead St., Whitehouse, Ohio, is scheduled to be published on Wednesday, Nov. 3, 1982, in a weekly newspaper, the Anthony Wayne Herald, in Waterville, Ohio.

Liz --

Sorry about the long delay in getting the Borden Inc. public notice out. Apparently Barb Russell and I misunderstood each other. I thought she had done it and she thought I had. Please check and make any changes you feel necessary. Thanks.

Dianne Rowland, 10/15

ADVERTISING ORDER

51863NALX
ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

DATE 8/17/84

U.S. Environmental Protection Agency-Waste Management Branch

The publisher of the publication named below is authorized to
in the enclosed advertisement according to the schedule
now provided the rates are not in excess of the commercial rates

charged to private individuals with the usual discounts. It is to be
set solid, without paragraphing, and without any display in the
heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN

Toledo Blade

SUBJECT OF ADVERTISEMENT

EDITION OF PAPER ADVERTISEMENT APPEARED
Morning

Public Notice

NUMBER OF TIMES ADVERTISEMENT APPEARED

DATE(s) ADVERTISEMENT APPEARED
August 31, 1984

ONE TIME

SPECIFICATIONS FOR ADVERTISEMENT

Place in legal notice/classified section

COPY FOR ADVERTISEMENT

See attached sheet

AUTHORITY TO ADVERTISE		INSTRUMENT OF ASSIGNMENT	
NUMBER	51863NALX	NUMBER	
DATE	August 22, 1984	DATE	
SIGNATURE OF AUTHORIZING OFFICIAL	<i>Brigitte Manzke</i>	TITLE	

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC,
D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 3:00 p.m., November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to ►.....

U.S. Environmental Protection Agency
230-S Dearborn
Financial Operations Section
Chicago, IL 60604

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OFFICE

U.S. Environmental Protection Agency-Waste Management Branch

PLACE VOUCHER PREPARED

230 S. Dearborn, Chicago, IL 60604

DATE PREPARED

8/17/84

For Agency Use Only

VOUCHER NUMBER

SCHEDULE NUMBER

PAID BY

NAME OF PUBLICATION

TOLEDO (Ohio) BLADE

NAME OF PUBLISHER OR REPRESENTATIVE

ADDRESS (Street, room number, city, State, and ZIP code)

541 Superior
Toledo, OH 43660
(419) 245-6000

LEGAL NOTICE DEPT.
ATTN: Ms. Lane

CHARGES

TYPEFACE	(size of type)	POINT PER	(inch, square, word, or folio)
Line Rates			
	NUMBER OR LINES (Indicate counted or space)	COST PER LINE	TOTAL COST
FIRST INSERTION		\$	\$
ADDITIONAL INSERTIONS GIVE NUMBER ▶			
TOTAL			\$
Other Rates			
	NUMBER OF UNITS (Indicate inch, square, word, folio)	COST PER UNIT	TOTAL COST
FIRST INSERTION		\$	\$
ADDITIONAL INSERTIONS GIVE NUMBER ▶			
TOTAL			\$

Attach one copy of advertisement (including upper and lower rules) to each copy of voucher here. If copy is not available sign the following affidavit.

TOTAL LINE RATES AND OTHER RATES	
LESS DISCOUNT AT %	
BALANCE DUE	\$
VERIFIED (Initials)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE

DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
SIGNATURE AND TITLE OF CERTIFYING OFFICER	DATE
SIGNATURE AND TITLE OF AUTHORIZING OFFICER	DATE
ACCOUNTING CLASSIFICATION	PAID BY CHECK NUMBER
<p>AFFIDAVIT OR TEAR SHEET NEEDED</p> <p>ESTIMATE: \$ 300.00</p> <p>OTN338 4A4E05\$002</p> <p>6540200 2540</p> <p>\$1.80 per line</p>	

If the ability to certify and authority to approve are combined in one person enter "N/A" (not applicable) here.

★ U.S. GPO: 1974-555-598

PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

U.S. Environmental Protection Agency-Waste Management Branch
 PLACE VOUCHER PREPARED
 9 S. Dearborn, Chicago, IL 60604

DATE PREPARED
 8/17/84

For Agency Use Only

VOUCHER NUMBER

SCHEDULE NUMBER

PAID BY

NAME OF PUBLICATION

TOLEDO (Ohio) BLADE

NAME OF PUBLISHER OR REPRESENTATIVE

ADDRESS (Street, room number, city, State, and ZIP code)

541 Superior
 Toledo, OH 43660
 (419) 245-6000

LEGAL NOTICE DEPT.
 ATTN: Ms. Lane

CHARGES

TYPEFACE	(size of type)	POINT PER	(inch, square, word, or folio)
	NUMBER OR LINES (Indicate counted or space)	COST PER LINE	TOTAL COST
Line Rates	FIRST INSERTION	\$	\$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶		
	TOTAL		\$
	NUMBER OF UNITS (Indicate inch, square, word, folio)	COST PER UNIT	TOTAL COST
Other Rates	FIRST INSERTION	\$	\$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶		
	TOTAL		\$
Attach one copy of advertisement (including upper and lower rules) to each copy of voucher here. If copy is not available sign the following affidavit.		TOTAL LINE RATES AND OTHER RATES	
		LESS DISCOUNT AT %	
		BALANCE DUE	\$
		VERIFIED (Initials)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE

DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN

DATE PUBLISHED

I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.

SIGNATURE AND TITLE OF CERTIFYING OFFICER

DATE

SIGNATURE AND TITLE OF AUTHORIZING OFFICER

DATE

ACCOUNTING CLASSIFICATION

AFFIDAVIT OR TEAR SHEET NEEDED

ESTIMATE: \$ 300.00

\$1.80 per line

PAID BY CHECK NUMBER

If the ability to certify and authority to approve are combined in one person enter "N/A" (not applicable) here.

★ U.S. GPO: 1974-555-598

PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE U.S. Environmental Protection Agency, Waste Management Branch		For Agency Use Only
PLACE VOUCHER PREPARED 230 S. Dearborn, Chicago, Illinois 60604		VOUCHER NUMBER
DATE PREPARED Oct. 15, 1982		SCHEDULE NUMBER
NAME OF PUBLICATION hony Wayne Herald of Waterville, Ohio		PAID BY
NAME OF PUBLISHER OR REPRESENTATIVE Allen Foster		
ADDRESS (Street, room number, city, State, and ZIP code) P.O. Box 8830, Toledo, Ohio 43623 ATTN: Jan FTS: 8-419-475-1501		

CHARGES

TYPEFACE	(size of type)	POINT PER	(inch, square, word, or folio)
	NUMBER OR LINES (Indicate counted or space)	COST PER LINE	TOTAL COST
Line Rates			
FIRST INSERTION		\$	\$
ADDITIONAL INSERTIONS GIVE NUMBER ▶			
TOTAL			\$
	NUMBER OF UNITS (Indicate inch, square, word, folio)	COST PER UNIT	TOTAL COST
Other Rates			
FIRST INSERTION		\$	\$
ADDITIONAL INSERTIONS GIVE NUMBER ▶			
TOTAL			\$
Attach one copy of advertisement (including upper and lower rules) to each copy of voucher here. If copy is not available sign the following affidavit.		TOTAL LINE RATES AND OTHER RATES	
		LESS DISCOUNT AT %	
		BALANCE DUE	\$
		VERIFIED (Initials)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE	
TITLE	DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
SIGNATURE AND TITLE OF CERTIFYING OFFICER	DATE
SIGNATURE AND TITLE OF AUTHORIZING OFFICER	DATE
ACCOUNTING CLASSIFICATION ESTIMATE: \$23.00	PAID BY CHECK NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

DATE

U.S. Environmental Protection Agency, Waste Management Branch

Oct. 15, 1982

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates

charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications

NAME OF THE PUBLICATION ADVERTISED IN

Anthony Wayne Herald -- Waterville, Ohio

SUBJECT OF ADVERTISEMENT

Public Notice

EDITION OF PAPER ADVERTISEMENT APPEARED

PM - Wednesday

NUMBER OF TIMES ADVERTISEMENT APPEARED

One Time

DATE(S) ADVERTISEMENT APPEARED

Nov. 3, 1982

SPECIFICATIONS FOR ADVERTISEMENT

Place in legal notice/classified section

COPY FOR ADVERTISEMENT

See attached

AUTHORITY TO ADVERTISE	INSTRUMENT OF ASSIGNMENT
NUMBER	NUMBER
DATE	DATE
SIGNATURE OF AUTHORIZING OFFICIAL	TITLE

INSTRUCTIONS TO PUBLISHERS

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D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 8:00 p.m., November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to ►

U.S. Environmental Protection Agency
Financial Operations Section
230 S. Dearborn
Chicago, Illinois 60604
IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA) has received a certification of change in status from Borden Chemical, Printing Ink Division, (Borden) located at 6725 Glead Street, Whitehouse, Ohio. Borden has stored hazardous (as defined by federal law) waste in containers. This action will change the status of Borden from a storage facility to a generator storing for fewer than 90 days (per 40 CFR 262.34). The status change for this facility was effected by removing hazardous waste stored for longer than 90 days and by limiting the present accumulation period to fewer than 90 days. The facility will be subject to the special provisions of 40 CFR 261.5 for small quantity generators in any calendar month if it generates less than 1000 kilograms of hazardous waste in that month.

The certification of change in status was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act, as amended. U.S. EPA required the certification of change in status when Borden requested a change in status from a storage facility to a small quantity generator.

The certification and related background materials are available to the public at U.S. EPA, Waste Management Branch, 230 South Dearborn Street, 13th Floor, Chicago, Illinois 60604, (312) 886-3715, from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials also may be seen during business hours at the Ohio Environmental Protection Agency, Northwest District, 1035 Deviac Grove Drive, Bowling Green, Ohio [contact Ben Chambers (419) 352-8461].

Public comments concerning the certification or this action are invited by U.S. EPA and will be accepted through October 1, 1984. Please send comments to:

U.S. Environmental Protection Agency
230 South Dearborn Street
5HW-13
Chicago, Illinois 60604
ATTN: Christine Klemme

PUBLIC NOTICE

The U.S. Environmental Protection Agency (USEPA) has received a closure plan from Borden, Inc. of Columbus, Ohio, for a drum storage area at its Borden Chemical Co. Printing Ink Division located at 6725 Gilead St., Whitehouse, Ohio. The plan, submitted on Sept. 13, 1982, proposes removal for off-site disposal of approximately 20,000 gallons of printing ink formulation wastes stored in drums. All equipment will be decontaminated. Borden Chemical Co., which mixes, blends and disperses colorants into printing inks, submitted the closure plan because of a change in the product line to a water-base system, which eliminated the use of lead chromium and cadmium pigments.

The Borden plan was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act. These were published under 40 CFR 265 Subpart G, which appeared in the Federal Register Jan. 12, 1981. The plan will be evaluated by USEPA according to the criteria of the regulations.

The plan and related background materials are available to the public at USEPA Waste Management Branch, 111 W. Jackson, Chicago, Illinois, (312) 886-3713, from 8:30 a.m. to 4:30 p.m. weekdays. These materials also may be seen during business hours at the Borden Chemical Co. plant office, 6725 Gilead St., Whitehouse, Ohio.

Public comments concerning this application are requested by USEPA and will be accepted through Dec. 6, 1982. Please send comments to:

U.S. Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

PUBLIC NOTICE

The U.S. Environmental Protection Agency (USEPA) has received a closure plan from Borden, Inc. of Columbus, Ohio, for a drum storage area at its Borden Chemical Co. Printing Ink Division located at 6725 Gilead St., Whitehouse, Ohio. The plan, submitted on Sept. 13, 1982, proposes removal for off-site disposal of approximately 20,000 gallons of printing ink formulation wastes stored in drums. All equipment will be decontaminated. Borden Chemical Co., which mixes, blends and disperses colorants into printing inks, submitted the closure plan because of a change in the product line to a water-base system, which eliminated the use of lead chromium and cadmium pigments.

The Borden plan was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act. These were published under 40 CFR 265 Subpart G, which appeared in the Federal Register Jan. 12, 1981. The plan will be evaluated by USEPA according to the criteria of the regulations.

The plan and related background materials are available to the public at USEPA Waste Management Branch, 111 W. Jackson, Chicago, Illinois, (312) 886-3713, from 8:30 a.m. to 4:30 p.m. weekdays. These materials also may be seen during business hours at the Borden Chemical Co. plant office, 6725 Gilead St., Whitehouse, Ohio.

Public comments concerning this application are requested by USEPA and will be accepted through Dec. 6, 1982. Please send comments to:

U.S. Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

State of Ohio)
: ss
County of Lucas)

Donald Doyle, being first duly sworn, says he is the
general manager of Herald Newspapers, Inc. and
publisher of the

- (X) Anthony Wayne Herald
- () Maumee Valley Herald
- () Sylvania Herald
- () West Toledo Herald

a weekly newspaper of general circulation therein,
Ohio (Lucas County) and that the annexed notice
was published in the aforesaid newspaper
for 1 consecutive weeks, begin-
ning November 3 A.D. 19 82.

Donald C. Doyle
Subscribed and sworn to before me this
day of December 3rd 19 82.

Anne K. Kumor
Notary Public in and for
LUCAS COUNTY, OHIO

ANNE K. KUMOR
Notary Public, State of Ohio
My Commission Expires August 26 1986

Description of Notice (s):

USEPA

Printer's Fee \$20.02

PUBLIC NOTICE

The U.S. Environmental Protection Agency (USEPA) has received a closure plan from Borden, Inc. of Columbus, Ohio, for a drum storage area at its Borden Chemical Co. Printing Ink Division located at 6725 Gilead St., Whitehouse, Ohio. The plan, submitted on Sept. 13, 1982, purposes removal for off-site disposal of approximately 20,000 gallons of printing ink formulation wastes stored in drums. All equipment will be decontaminated. Borden Chemical Co., which mixes, blends and disperses colorants into printing inks, submitted the closure plan because of a change in the product line to a waste-base system, which eliminated the use of lead, chromium and cadmium pigments.

The Borden plan was submitted to satisfy regulations promulgated under the Resource conservation and Recovery Act. These were published under 40 CFR 265 Subpart G, which appeared in the Federal Register Jan. 12, 1981. The plan will be evaluated by USEPA according to the criteria of the regulations.

The plan and related background materials are available to the public at USEPA Waste Management Branch, 111 W. Jackson, Chicago, Illinois, (312) 886-3713, from 8:30 a.m. to 4:30 p.m. weekdays. These materials also may be seen during business hours at the Borden Chemical Co. plant office, 6725 Gilead St., Whitehouse, Ohio.

Public comments concerning this application are requested by USEPA and will be accepted through Dec. 6, 1982. Please send comments to:
U.S. Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois, 60690



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

APR 1 1982

T. W. Shadle
Borden Chemical Printing Ink Div.
6725 Gilead Street
Whitehouse, Ohio 43571

RE: Interim Status Acknowledgement USEPA ID No. OHD005043740
FACILITY NAME: Borden Chemical Printing Ink Div.

Dear Mr. Shadle:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,


Karl J. Klepitsch, Jr., Chief
Waste Management Branch

K.M. Horner
3/31/82

Enclosure

cc: Robert W. Gutheil

FACILITY NAME

BORDEN CHEMICAL PRINTING INK DIV

EPA ID NUMBER

OHD005043740

FACILITY OPERATOR

BORDEN INC

FACILITY OWNER

BORDEN INC

FACILITY LOCATION

6725 GILEAD STREET
WHITEHOUSE

OH 43571

PROCESS CODE

DESIGN CAPACITY

UNIT OF MEASURE

S01

20,000

~~100.00000~~

G

~~S02~~~~100.00000~~~~G~~

*****KEY*****

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE	* UNIT OF MEASURE	CODE
STORAGE:				
CONTAINER	S01	G OR L	* GALLONS	G
TANK	S02	G OR L	* LITERS	L
WASTE PILE	S03	Y OR C	* CUBIC YARDS	Y
SURFACE IMPOUNDMENT	S04	G OR L	* CUBIC METERS	C
DISPOSAL:			* GALLONS PER DAY	U
			* LITERS PER DAY	V
			* TONS PER HOUR	D
INJECTION WELL	D79	G, L, U, OR V	* METRIC TONS\HOUR	W
LANDFILL	D80	A OR F	* GALLONS\HOUR	E
LAND APPLICATION	D81	B OR Q	* LITERS\HOUR	H
OCEAN DISPOSAL	D82	U OR V	* ACRE-FEET	A
SURFACE IMPOUNDMENT	D83	G OR L	* HECTARE-METER	F
TREATMENT:			* ACRES	B
			* HECTARES	Q
TANK	T01	U OR V	* POUNDS\HOUR	J
SURFACE IMPOUNDMENT	T02	U OR V	* KILOGRAMS\HOUR	R
INCINERATOR	T03	D, W, E, OR H	* TONS PER DAY	N
OTHER	T04	J, R, N, S, U, V	* METRIC TONS\DAY	S



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• OHD005043740

REACKNOWLEDGEMENT

BORDEN CHEMICAL PRINTING INC
6725 GILEAD STREET
WHITEHOUSE

OH 43571

INSTALLATION ADDRESS

6725 GILEAD STREET
WHITEHOUSE

OH 43571

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITYINSTALLATION'S EPA
I.D. NO.

OH0005043740

NAME OF INSTALLATION

II. INSTALLATION
MAILING
ADDRESSBORDEN INC
6725 GILEAD ST
WHITEHOUSE, OH 43571III. LOCATION
OF INSTALLATION6725 GILEAD ST
WHITEHOUSE, OH 43571

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

003051 AUG 25 80

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

S

F

T/A

C

2

1

A

80 08 18

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

C

3

15

16

CITY OR TOWN

ST.

ZIP CODE

C

4

15

16

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

C

5

15

16

CITY OR TOWN

ST.

ZIP CODE

C

6

15

16

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

C

2

15

16

SHADLE T W LAB PRODUCTION MGR

419-877-5392

15

16

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

C

8

15

16

BORDEN INC.

15

16

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☒ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

OH0005043740

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 2 23 - 26	2 F 0 0 3 23 - 26	3 F 0 0 5 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 K 0 8 6 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 P 0 3 0 23 - 26	32 U 0 0 2 23 - 26	33 U 0 3 1 23 - 26	34 U 0 5 6 23 - 26	35 U 0 6 9 23 - 26	36 U 0 8 0 23 - 26
37 U 0 8 8 23 - 26	38 U 1 0 2 23 - 26	39 U 1 0 7 23 - 26	40 U 1 1 2 23 - 26	41 U 1 4 0 23 - 26	42 U 1 5 4 23 - 26
43 U 1 5 9 23 - 26	44 U 1 6 1 23 - 26	45 U 1 7 1 23 - 26	46 U 2 2 0 23 - 26	47 U 2 2 6 23 - 26	48 U 2 3 9 23 - 26

D. LISTED HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

W. Barclay Barton

NAME OF OFFICIAL (Type or print)

W Barclay Barton
Director Environmental Affairs

DATE SIGNED

8/7/80

SEP 28 1984

SMU-11

R.J. Ventres, Executive Vice President
Sorden Chemical Company-
Printing Ink Division
188 East Broad Street
Columbus, Ohio 43215

RE: Withdrawal of Part A
FACILITY NAME: Sorden Chemical Company-
Printing Ink Division
U.S. EPA ID #: OH0 005-043-740

Dear Mr. Ventres:

This Agency has been advised by the Ohio Environmental Protection Agency (Ohio EPA) that the referenced facility is no longer operating as a storage facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a generator storing less than 90 days. This letter acknowledges your change in status.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you propose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 385-6194, for assistance.

Sincerely yours,

Karl J. Klapitach, Jr., Chief
Waste Management Branch

cc: Tom Carlisle, Ohio EPA
Cheryl Kaiser, Ohio EPA
Environmental Engineer

Thomas W. Shadle,
Operations Manager

bcc: Lisa Pierard
Part A file
Rebecca Strom

INITIALS
DATE
TYPIST
AUTHOR
STU #1
CHIEF
STU #2
CHIEF
STU #3
CHIEF
TIPS
CHIEF
WMB
CHIEF
DIRECTOR

9/26/84

9/26/84

9/26/84

9/26/84

9/26/84

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9/26/84

9/26/84

9/26/84

SEP 2 8 1984

Mr. J. K. [unclear]
[unclear] [unclear]
[unclear] [unclear]
[unclear] [unclear]
[unclear] [unclear]
[unclear] [unclear]

Mr. J. K. [unclear]
[unclear] [unclear]
[unclear] [unclear]
[unclear] [unclear]
[unclear] [unclear]

Dear Mr. [unclear]:

This agency has been advised by the Ohio Environmental Protection Agency (OEPA) that the [unclear] facility is no longer operating as a storage facility under [unclear] rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a generator storing less than 30 days. This letter acknowledges your change in status.

Should you desire to initiate storage of hazardous wastes for [unclear] more than 30 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you desire to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment, storage, or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least 30 days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submission of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. EPA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact Rebecca [unclear] at (216) 222-2122, for assistance.

Sincerely yours,

Mr. J. K. [unclear], Jr., Chief
[unclear] Management Branch

Mr. [unclear], Ohio EPA
[unclear] [unclear]
[unclear] [unclear]

Thomas A. [unclear]
[unclear] [unclear]

Rebecca [unclear]
Part A file
Rebecca [unclear]

DATE
INITIALS

10/3/84
TYPYST

10/3/84
AUTHOR

10/3/84
CHIEF
STU #1

10/3/84
CHIEF
STU #5

10/3/84
CHIEF
STU #3

10/3/84
CHIEF
STU #2

10/3/84
CHIEF
MWB

10/3/84
DIRECTOR

22
10/3

10/3/84
10/3/84
10/3/84

9/12/83
CHD 000 043740

BORDEN INC

165 N. WASHINGTON AVENUE, COLUMBUS, OHIO 43215



August 5, 1983

THOMAS R. HEATON
ENVIRONMENTAL SPECIALIST
ENVIRONMENTAL AFFAIRS

RECEIVED
USEPA REGION V
CHICAGO, IL

USEPA Region V
RCRA Activities
P.O. Box 3587-A
Chicago, IL 60690

Attn: Ms. Rebecca Strom

Re: Signatory Authorization

Dear Ms. Strom:

As per our telephone conversation on July 28, 1983, I am enclosing the letter from Mr. Ventres, Borden Inc. Executive Vice President, authorizing W. Bailey Barton to sign RCRA related documents.

If you have any questions, please call me at (614) 225-4860.

Sincerely,

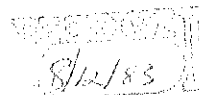
Thomas R. Heaton

Thomas R. Heaton

TRH/slw

cc: W. B. Barton
R. J. Ventres

Enclosure



BORDEN CHEMICAL
DIVISION OF BORDEN INC



R. J. VENTRES
PRESIDENT

August 2, 1983

TO WHOM IT MAY CONCERN:

This will authorize W. Bailey Barton, Director, Environmental Affairs, to sign permit applications, certification statements and withdrawal request submitted to USEPA regarding hazardous waste activity in Borden Chemical, Division of Borden Inc.

R. J. Ventres
Executive Vice President
Borden Inc

RJV:ac



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. T.W. Shadle
Borden Chemical Printing, Inc.
6725 Gilead Street
Whitehouse, Ohio

RE: OHD005043740
Borden Chemical Printing, Inc.
Whitehouse, Ohio

Dear Mr. Shadle:

To facilitate the processing of hazardous waste permit applications, we are making two additional requirements concerning the format of these applications:

1. Please uniquely number each page of the application including all attachments (maps, specifications, etc.)
2. If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

If you have any questions, please call the person indicated in the Part B request letter. Thank you for your cooperation.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

FILE



MAY 20 1982

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-TUB

Mr. T.W. Shadle
Borden Chemical Printing, Inc.
6725 Gilead Street
Whitehouse, Ohio

OHD 005 04 3740
RE: EPA ID# OHD005943740
Borden Chemical Printing, Inc.
Whitehouse, Ohio

Dear Mr. Shadle:

Recently, we requested you to submit a Part B application for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program.

In an attempt to coordinate the review of your application with the Ohio Environmental Protection Agency (OEPA), and striving for a simultaneous issuance or denial of Federal and State hazardous waste facility permits, we urge you to submit three copies of your Part B to OEPA at the same time it is submitted to this Agency. The mailing address for OEPA is:

Ohio Environmental Protection Agency
Division of Hazardous Materials Management
361 East Broad Street Box 1049
Columbus, Ohio 43216

Your direct submittal is necessary to allow OEPA to begin processing under Ohio state law. If you send copies directly to OEPA, you need send only three (rather than four) copies to USEPA.

If you have questions concerning the Ohio permitting process, please contact Mr. Paul Flanigan of OEPA at (614) 462-6303, or Mr. Bob Fragale of the Ohio Hazardous Waste Facility Approval Board at (614) 462-6981. If you have questions concerning the Federal permit process, please contact your permit-writer in this Agency, or Ms. Kathleen Homer, State Implementation Officer for Ohio, at (312) 886-6148.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Paul Flanigan - OEPA
Bob Fragale - HWFAB

North west District

hwfab

P.O. Box 1049
361 E. Broad St.
Columbus, Ohio 43216
(614) 462-6981

hazardous • waste • facility • approval • board

Richard F. Celeste, Governor
Robert H. Maynard, Chairman

RECEIVED
OHIO EPA

NOV 25 1983

November 23, 1983

DIV. HAZARDOUS
MATERIALS MANAGEMENT

Thomas R. Heaton
Borden Chemical, Printing Ink Div.
165 N. Washington Avenue
Columbus, Ohio 43215

Dear Mr. Thomas R. Heaton:

OHDO05043740 G, TRS, TSD, PA

Please disregard our letter of November 21, 1983, as an erroneous permit number was used on that correspondence. This correspondence officially acknowledges our receipt of the Board certified copy of the hazardous waste permit originally issued to your facility.

The permit (#03-48-0146) is considered to be withdrawn at your request and therefore is no longer valid.

If you have any questions concerning your permit, please do not hesitate to contact me. I again apologize for the mistake.

Sincerely,



Philbin L. Scott
Technical Advisor

PLS/dmc

cc: Tom Crepeau, Ohio EPA DHMM
Facility File

RECEIVED

AUG 14 1984

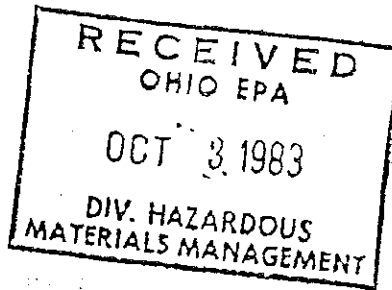
WMD-RAIU
EPA, REGION V

OHIO EPA

03-48-0146ED

Re: Lucas County
Hazardous Materials
Borden Chemical Printing Ink
HWFAB #03-48-0146

6



September 28, 1983

Mr. Thomas W. Shadle
Operations Manager
Borden Chemical Printing Ink
6725 Glead Street
Whitehouse, OH 43571

Dear Mr. Shadle:

On August 30, 1983, I conducted an inspection of your facility for compliance with State of Ohio Hazardous Waste Regulations. As a formality, a Generator inspection was conducted pending final determination of your ink wash. No violations were found at that time. A copy of the inspection form is enclosed for your records. As I mentioned during the time of the inspection, Federal regulation numbers are used for reference only.

I questioned your IOC from F. Rosenbloom stating that your K086 ink wash is non-hazardous since K086 is a listed hazardous waste and normally requires a formal delisting from the U.S. EPA in Washington, D.C. I discussed this with Ken Humphrey, Technical Assistance, Central Office. Our determination is that the waste is non-hazardous only if it never had chrome or lead in it.

If this is the case, your facility will remain a Small Quantity Generator. If not, you must continue to maintain Generator status. There appears to be no problem for you to ship your waste within 90 days.

If you have any questions, please call me at 352-8461.

Sincerely,

A handwritten signature in cursive script, appearing to read "David L. Ferguson".

David L. Ferguson
Division of Hazardous Materials Management

DLF/kb

Enclosure

cc: Paula Cotter, DHMM, CO ✓

03-48-0146

BORDEN CHEMICAL RECEIVED
DIVISION OF BORDEN INC OHIO EPA



SEP 30 1983

DIV. HAZARDOUS
MATERIALS MANAGEMENT

R. J. VENTRES
PRESIDENT

September 19, 1983

Mr. Thomas E. Crepeau
Ohio EPA
Division of Hazardous Materials Management
Permits & Manifest Records Section
361 E. Broad Street
Columbus, Ohio 43215

Re: Permit Withdrawal Request
Borden Chemical, Printing Ink Division
Whitehouse, Ohio HWFAB #03-48-0146

Borden Chemical, Adhesives &
Chemical Division
Delaware, Ohio HWFAB #01-21-0144

Dear Mr. Crepeau:

Borden Inc. withdraws "treater, storer, or disposer" (TSD) status for the referenced facilities. An explanation for TSD status withdrawal follows for each facility:

Borden Chemical, Printing Ink Division, Whitehouse, Ohio -
HWFAB #03-48-0146

Drum storage (S01) and tank storage (S02) of hazardous waste was initially applied for at this site. The tank in question was never used for hazardous waste storage. Withdrawal of drum storage is justified because of the low volume of drummed hazardous waste generated. For the past 12 months, drummed hazardous waste has not been stored on-site longer than 90 days. This policy will continue, necessitating generator status only.

9/19/83

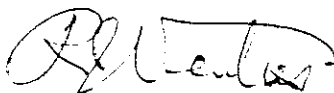
Borden Chemical, Adhesives & Chemical Division, Delaware,
Ohio - HWFAB #01-21-0144

The original permit application for this site was for storage of hazardous waste in drums (S01) and in a tank (S02). There has never been storage of hazardous waste in drums at this site. The referenced storage tank is a recycling vessel for caustic wash solution. Approximately once per year, the sludge generated in this tank is pumped out for off-site treatment at a licensed facility. The recycling tank is exempt from regulation under paragraph (A) of rule 3745-51-06.

Borden does wish to maintain generator status at these locations and will comply with all regulations accompanying this status.

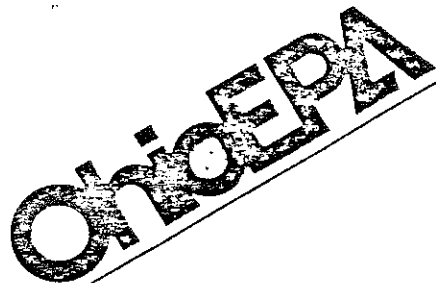
If you have any questions, please call Tom Heaton of our Environmental Affairs staff at (614) 225-4860.

Very truly yours,



R. J. Ventres

RJV:ac



RECEIVED
OHIO EPA

SEP 30 1983

CERTIFICATION STATEMENT

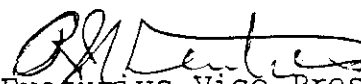
DIV. HAZARDOUS
MATERIALS MANAGEMENT

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Permit Appl. No. 03-48-0146

Borden Chemical, Printing Ink
Facility Name Division, Whitehouse,
Ohio

Signature of Executive Officer


Executive Vice President
Title Borden Inc.

September 19, 1983
Date

WHO SHOULD SIGN THE CERTIFICATION STATEMENT?

- A. For a corporation: By a principal executive officer of at least the level of vice president;
- B. For partnership or sole proprietorship: By a general partner or the proprietor, respectively; or
- C. For a municipality, State, Federal or other public facility: By either a principal executive officer or ranking elected official.

Note: Establishment of a hazardous waste facility without an effective permit is prohibited pursuant to Sections 3734.02 and 3734.11 of the Ohio Revised Code.

0427R

BORDEN INC

180 EAST BROAD STREET, COLUMBUS, OHIO 43215

Contact & Mailing Add. changed
4-28-82 MGP



THOMAS R. HEATON
ENVIRONMENTAL SPECIALIST
ENVIRONMENTAL AFFAIRS

April 13, 1982

Orig to PA
Copies to notif files

RECEIVED

APR 15 1982

WASTE MANAGEMENT BRANCH
EPA REGION V

USEPA, Region V
RCRA Activities
P.O. Box 17861
Chicago, IL 60680

Dear Sirs:

Enclosed herewith is a list of the Borden Inc. facilities for which permit applications to treat, store, or dispose of hazardous waste were submitted to your office on November 18, 1980. Directing your attention to the "reverse" side of Form 1, General of these applications, Borden Chemical's owner/operator representative, Mr. Robert W. Gutheil, discharges the direct responsibility for environmental concerns to Borden's Director of Corporate Environmental Affairs.

Therefore, to avoid any potential for a correspondence from your agency to be misdirected, please send future correspondence which would normally go to the owner/operator representative to:

W. Bailey Barton
Director, Environmental Affairs
Borden, Inc.
180 E. Broad St.
Columbus, Ohio 43215

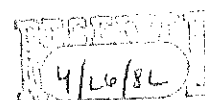
Thank you for your cooperation in this matter.

Sincerely,

Thomas R. Heaton

Thomas R. Heaton

TRH/slw



PERMIT APPLICATION FOR A FACILITY TO
TREAT, STORE OR DISPOSE OF
HAZARDOUS WASTES
PART A, FORMS 1 AND 3

SUBMISSIONS TO US EPA REGION V
November 18, 1980

FACILITY

CITY

STATE

Smith-Douglass
Smith-Douglass
Smith-Douglass
Borden Chemical, Adhesives &
Chemicals Div.
Columbus Coated Fabrics Div.
Borden Chemical, Printing Ink Div.
Borden Chemical, Printing Ink Div.
Borden Chemical, Adhesives &
Chemicals Div.
Borden Chemical, Printing Ink Div.
Borden Chemical, Adhesives &
Chemicals Div.
Borden Chemical, Printing Ink Div.
Borden Chemical, Thermoplastics Div.
Borden Chemical, Printing Ink Div.

Streator
Hampshire
Saginaw
Sheboygan

Columbus
Menasha
Whitehouse
Cicero

Portage
Delaware

St. Charles
Illioopolis
Woodlawn

IL 12D003178175
IL 12D005468822
MI 12D0068824655
WI 12D023540263

OH 04D004294351
WI 12D099139933
OH 04D005043740
IL 12D074367434

MI 12D092950195
OH 04D004297839

IL 12D064017946
IL 12D005158548
OH 04D0068932011

MAR 31 1982

SHW-TUD

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. T.W. Shadle
Lab Production Mgr.
Borden Chemical Printing Ink
6725 Gilead Street
Whitehouse, Ohio 43571

RE: OHDD05043740
Borden Chemical Printing Ink
Div. of Borden, Inc.
6725 Gilead St.
Whitehouse, Ohio 43571

Dear Mr. Shadle:

By now you should have received an acknowledgement of our receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program. You should also have been apprised of your condition relative to interim status.

Accordingly, this letter constitutes the next step in the formal process leading to issuance or denial of an RCRA permit. Under the authority of 40 CFR 122.22, this is a formal request for submittal of Part B of your application for the above-referenced facility.

Enclosed is a copy of 40 CFR 122.25 which lists the items that constitute a Part B for your facility. Your Part B application must be submitted in quadruplicate and postmarked no later than September 30, 1982. Please send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
USEPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently I suggest you contact Dr. Eugene Meyer of my staff at (312) 353-0256, as you begin preparing your application. Dr. Meyer will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

While your complete application is due no later than the above date, you are encouraged to submit at your earliest opportunity those components which have been completed. Several interim status documents also are used as components of your Part B application. Included are such items as your waste analysis plan, contingency plan, closure plan, etc., each of which may be submitted to this office immediately, to initiate the processing of your Part B application.

Failure to furnish your complete Part B application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 122.22.

Information you submit in the Part B application can be disclosed to the public, according to the Freedom of Information Act and U.S. Environmental Protection Agency (USEPA) Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. USEPA will review business confidentiality claims under regulations at 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

We have also enclosed a copy of 40 CFR Part 264 which includes technical standards for the operation of treatment and storage facilities. These standards will become applicable upon issuance of a permit to your facility by USEPA.

We will coordinate review of your application with the Ohio Environmental Protection Agency and the Hazardous Waste Facility Approval Board, and if your application is acceptable, will strive for a simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of your application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and the State in lieu of USEPA will make the final determination on your application.

We look forward to receiving your Part B application.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures: 40 CFR 122.25
40 CFR 264

cc: Robert W. Gutheil

Paul Flanigan, OEPA
Peggy Vince, HWFAB

INITIALS	DATE	3/31/82	PEU CHIEF	STU #1 CHIEF	STU #2 CHIEF	TPS CHIEF	WMB CHIEF	AHMD DIRECTOR
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FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)	
I. EPA I.D. NUMBER PA I.D. NUMBER III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION		RECEIVED SEP 13 1982 PLEASE PLACE LABEL IN THIS SPACE WASTE MANAGEMENT BRANCH EPA REGION V 9/13/82	

I. EPA I.D. NUMBER

F	O	H	D	0	0	5	0	4	3	7	4	0
1	2						13		14	15		

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	Borden Chemical Printing Ink
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IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	Shadle, TW Lab Production Mgr.	419	877 5392

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN	C. STATE	D. ZIP CODE
3	6725 Gilead Street	Whitehouse	OH	43571

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	Same	LUCAS					



CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
C	1	2	3	4	5	6	7	8	9	C	1	2	3	4	5	6	7	8	9
7	2	8	9	3						7									
(specify) Printing Ink										(specify)									
C. THIRD										D. FOURTH									
C	1	2	3	4	5	6	7	8	9	C	1	2	3	4	5	6	7	8	9
7										7									
(specify)										(specify)									

VIII. OPERATOR INFORMATION

A. NAME																									B. Is the name listed in Item VIII-A also the owner?									
C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO								
8	B	o	r	d	e	n		I	n	c																	66							
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																									D. PHONE (area code & no.)									
F = FEDERAL M = PUBLIC (other than federal or state) P (specify) S = STATE O = OTHER (specify) P = PRIVATE																									C A 6 1 4 2 2 5 4 0 0 0 15 16 17 18 19 20 21 22 23 24									
E. STREET OR P.O. BOX																																		
1 8 0 E B r o a d S t r e e t																																		
F. CITY OR TOWN															G. STATE					H. ZIP CODE					IX. INDIAN LAND									
B C o l u m b u s															O H					4 3 2 1 5					Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									
15 16 17 18 19 20 21 22 23 24															40 41 42 43 44 45 46 47 48 49					50 51 52 53 54 55 56 57 58 59														

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)															
C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	
9	N									9	P																			
15 16 17 18 19 20 21 22 23 24															25 26 27 28 29 30 31 32 33 34															
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)															
C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	
9	U									9						(specify)														
15 16 17 18 19 20 21 22 23 24															25 26 27 28 29 30 31 32 33 34															
C. RCRA (Hazardous Wastes)															E. OTHER (specify)															
C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	
9	R									9						(specify)														
15 16 17 18 19 20 21 22 23 24															25 26 27 28 29 30 31 32 33 34															

Misc. State Permits

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

The mixing, blending and dispersing of colorants into printing inks and servicing of the printing industry.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME & OFFICIAL TITLE (type or print)															B. SIGNATURE															C. DATE SIGNED									
Robert W. Gutheil, President Borden Chemical															<i>Robert W. Gutheil</i>															11/17/80									

COMMENTS FOR OFFICIAL USE ONLY

C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
C																									

RCRA	EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			FOH D 0 0 5 0 4 3 7 4 0											

FOR OFFICIAL USE ONLY														
APPLICATION APPROVED					DATE RECEIVED (yr., mo., & day)					COMMENTS				
23					24					29				

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)														
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)														
<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)														
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)														
FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN														
B. REVISED APPLICATION (place an "X" below and complete Item I above)														
<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS														
<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT														

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

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III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS.....P
TONS.....T

METRIC UNIT OF MEASURE CODE
KILOGRAMS.....K
METRIC TONS.....M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY													
<div style="display: flex; justify-content: space-between;"> W O H D 0 0 5 0 4 3 7 4 0 T/A C </div>													<div style="display: flex; justify-content: space-between;"> W DUP T/A C 2 DUP </div>													
DESCRIPTION OF HAZARDOUS WASTES (continued)																										
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		D. PROCESSES															
	23	24	25	26	27	28	29	30	31	32	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
											27	28	29	27	28	29	27	28	29	27	28	29				
1	K	0	8	6	54,000				P		S	0	1	S	0	2										
2																										
3																										
4																										
5																										
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25																										
26																										

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	O	H	D	0	0	5	0	4	3	7	4	0	TIA	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	1	3	1	0	5	0
55	56	57	58	59	60	61

LONGITUDE (degrees, minutes, & seconds)

0	8	3	4	8	0	3	0
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E
12	16

 Borden Inc

6	1	4	2	2	5	4	2	9	2
55	56	57	58	59	60	61	62	63	64

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F
13	16

 180 E Broad St.

C	G
43	46

 Columbus

0	4
40	42

4	3	2	1	5
47	48	49	50	51

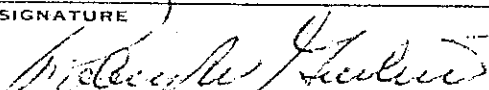
IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Robert W. Gulheil, President
Borden Chemical

B. SIGNATURE



C. DATE SIGNED

11/17/80

X. OPERATOR CERTIFICATION

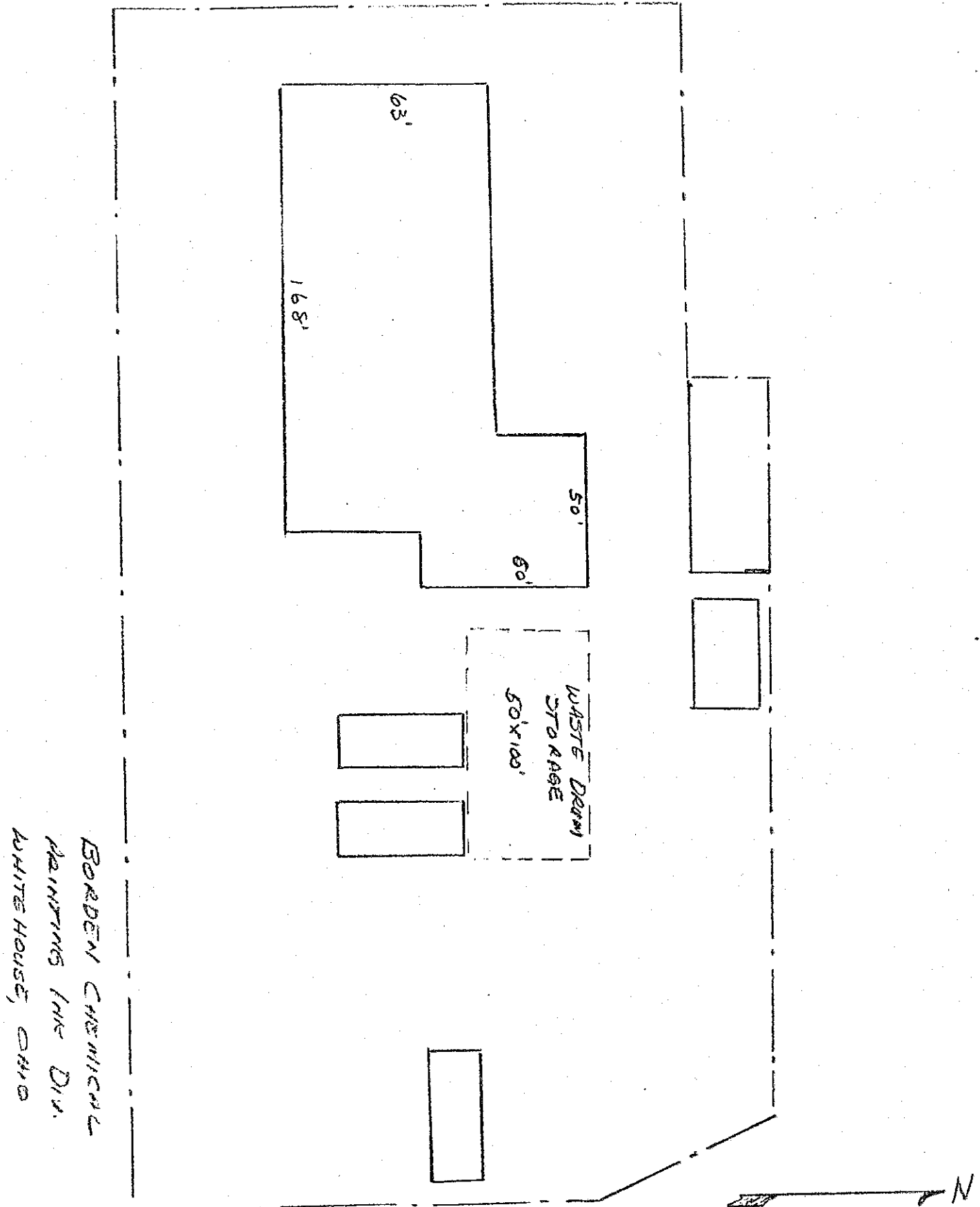
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

V. FACILITY DRAWING (see page 4)



FORM 1		U.S. ENVIRONMENTAL PROTECTION AGENCY		I. EPA I.D. NUMBER	
GENERAL		GENERAL INFORMATION		F O H D 0 0 5 0 4 3 7 4 0 3 D	
LABEL ITEMS		Consolidated Permits Program		GENERAL INSTRUCTIONS	
II. FACILITY NAME		(Read the "General Instructions" before starting.)		If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME		PLEASE PLACE LABEL IN THIS SPACE		CLOSED FACILITY TSD ONLY	
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	Borden Chemical Printing Ink Division Borden
---	------	--

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	Shadle, TW Lab Production Mgr.	419	877 5392

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	6725 Gilead Street	4	Whitehouse	OH	43571

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN		D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	Same	6	LUCAS	7	WHITEHOUSE	OH	43571	095

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
C	7	2	8	C	7		
15	16	17	18	15	16	17	18
(specify) Printing Ink				(specify)			
C. THIRD				D. FOURTH			
C	7			C	7		
15	16	17	18	15	16	17	18
(specify)				(specify)			

VIII. OPERATOR INFORMATION

A. NAME																									B. Is the name listed in Item VIII-A also the owner?				
C	8	B	o	r	d	e	n	I	n	c																66	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
15	16																								55				
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																									D. PHONE (area code & no.)				
F = FEDERAL M = PUBLIC (other than federal or state) P (specify) S = STATE O = OTHER (specify)																									6 1 4 2 2 5 4 0 0 0				
E. STREET OR P.O. BOX																													
1 8 0 E Broad Street																													
F. CITY OR TOWN															G. STATE		H. ZIP CODE		IX. INDIAN LAND										
B C o l u m b u s															O H		4 3 2 1 5		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO										
																			52										

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
C	9	N								C	9	P							
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
C	9	U								C	9								
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24
										(specify) Misc. State Permits									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
C	9	R								C	9								
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24
										(specify)									

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

The mixing, blending and dispersing of colorants into printing inks and servicing of the printing industry.

F9: A
51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Robert W. Gutheil, President Borden Chemical	<i>Robert W. Gutheil</i>	11/17/80

COMMENTS FOR OFFICIAL USE ONLY

C	15	16	17	18	19	20	21	22	23	24	25
C											

FORM 3 RCRA	EPA	ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			S T A C											
			F O H D 0 0 5 0 4 3 7 4 0 3 1											

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)	<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)
71	71
C	FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)
8	YR. MO. DAY
5 8	0 3 0 1
15	73 74 75 76 77 78

B. REVISED APPLICATION (place an "X" below and complete Item I above)

<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS	<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT
72	72

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S	T A C																
C	D U P																
1 2	13 14 15																
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY						FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY						FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)		2. UNIT OF MEASURE (enter code)							1. AMOUNT		2. UNIT OF MEASURE (enter code)				
X-1	S 0 2	600	G						5								
X-2	T 0 3	20	E						6								
1	S 0 1	100000	G						7								
2	S 0 2	100000	G						8								
3									9								
4									10								
16 - 18 19	27						28	29 - 32	16 - 18 19	27						28	29 - 32

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

- 2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
S W O H D 0 0 5 0 4 3 7 4 0 3 1													S W DUP 3 2 DUP												
1 2 13 14 15													1 2 13 14 15 23 24 25 26												
DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																					
				1. PROCESS CODES (enter)																					
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																					
1	K 0 8 6	54,000 000	P	S 0 1 S 0 2																					
2																									
3																									
4																									
5																									
6																									
7																									
8																									
9																									
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25																									
26																									

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	O	H	D	0	0	5	0	4	3	7	4	0	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6: $\frac{A}{55}$

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6: $\frac{N}{56}$

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

41 31 05.0

LONGITUDE (degrees, minutes, & seconds)

083 48 03.0

VIII. FACILITY OWNER

- ☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

Borden Inc

2. PHONE NO. (area code & no.)

614-225-4292

3. STREET OR P.O. BOX

180 E Broad St.

4. CITY OR TOWN

Columbus

5. ST.

OH

6. ZIP CODE

43215

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Robert W. Gutheil, President
Borden Chemical

B. SIGNATURE

C. DATE SIGNED

11/17/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

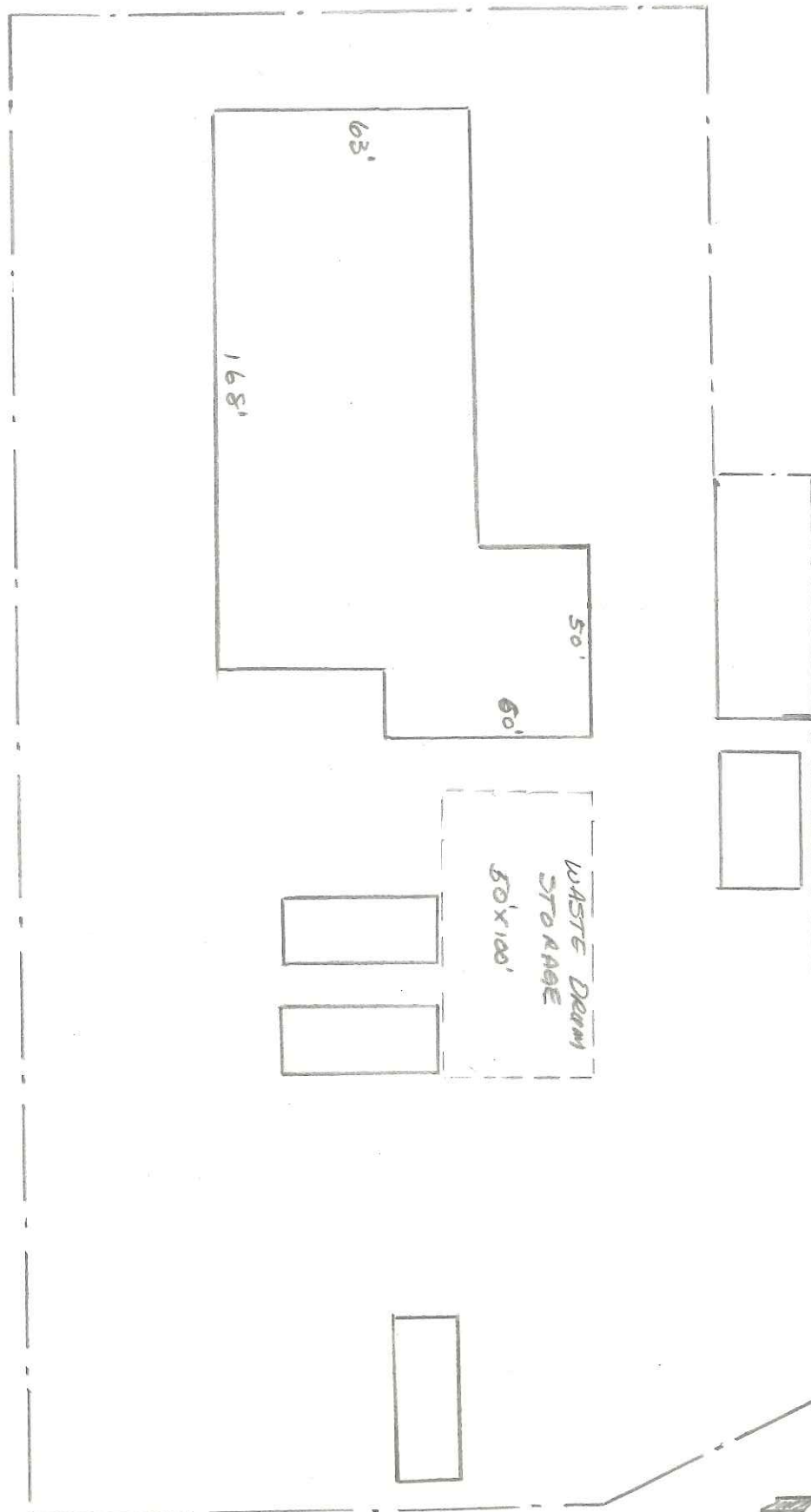
A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

V. FACILITY DRAWING (see page 4)

450



BORDEN CHEMICAL
PAINTING INC. DIV.
WHITE HOUSE, OHIO

Northwest District

hwfab

hazardous • waste • facility • approval • board

Richard F. Celeste, Governor
Robert H. Maynard, Chairman

P.O. Box 1049
361 E. Broad St.
Columbus, Ohio 43216
(614) 462-6981

RECEIVED
OHIO EPA

NOV 25 1983

November 23, 1983

DIV. HAZARDOUS
MATERIALS MANAGEMENT

Thomas R. Heaton
Borden Chemical, Printing Ink Div.
165 N. Washington Avenue
Columbus, Ohio 43215

Dear Mr. Thomas R. Heaton:

0HD005043740 G, TRS, TSD, PA

Please disregard our letter of November 21, 1983, as an erroneous permit number was used on that correspondence. This correspondence officially acknowledges our receipt of the Board certified copy of the hazardous waste permit originally issued to your facility.

The permit (#03-48-0146) is considered to be withdrawn at your request and therefore is no longer valid.

If you have any questions concerning your permit, please do not hesitate to contact me. I again apologize for the mistake.

Sincerely,



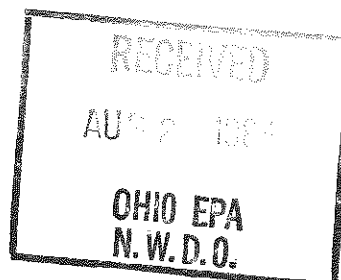
Philbin L. Scott
Technical Advisor

PLS/dmc

cc: Tom Crepeau, Ohio EPA DHMM
Facility File

RECEIVED

WMD-RAIU
EPA, REGION V



03-48-C146

BORDEN CHEMICAL RECEIVED
DIVISION OF BORDEN INC OHIO EPA



SEP 30 1983

DIV. HAZARDOUS
MATERIALS MANAGEMENT

R. J. VENTRES
PRESIDENT

September 19, 1983

Mr. Thomas E. Crepeau
Ohio EPA
Division of Hazardous Materials Management
Permits & Manifest Records Section
361 E. Broad Street
Columbus, Ohio 43215

Re: Permit Withdrawal Request
Borden Chemical, Printing Ink Division
Whitehouse, Ohio HWFAB #03-48-0146

Borden Chemical, Adhesives &
Chemical Division
Delaware, Ohio HWFAB #01-21-0144

Dear Mr. Crepeau:

Borden Inc. withdraws "treater, storer, or disposer" (TSD) status for the referenced facilities. An explanation for TSD status withdrawal follows for each facility:

Borden Chemical, Printing Ink Division, Whitehouse, Ohio -
HWFAB #03-48-0146

Drum storage (S01) and tank storage (S02) of hazardous waste was initially applied for at this site. The tank in question was never used for hazardous waste storage. Withdrawal of drum storage is justified because of the low volume of drummed hazardous waste generated. For the past 12 months, drummed hazardous waste has not been stored on-site longer than 90 days. This policy will continue, necessitating generator status only.

9/19/83

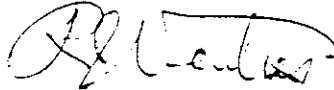
Borden Chemical, Adhesives & Chemical Division, Delaware,
Ohio - HWFAB #01-21-0144

The original permit application for this site was for storage of hazardous waste in drums (S01) and in a tank (S02). There has never been storage of hazardous waste in drums at this site. The referenced storage tank is a recycling vessel for caustic wash solution. Approximately once per year, the sludge generated in this tank is pumped out for off-site treatment at a licensed facility. The recycling tank is exempt from regulation under paragraph (A) of rule 3745-51-06.

Borden does wish to maintain generator status at these locations and will comply with all regulations accompanying this status.

If you have any questions, please call Tom Heaton of our Environmental Affairs staff at (614) 225-4860.

Very truly yours,



R. J. Ventres

RJV:ac

RECEIVED
OHIO EPA

SEP 30 1983

CERTIFICATION STATEMENT

DIV. HAZARDOUS
MATERIALS MANAGEMENT

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Permit Appl. No. 03-48-0146

Borden Chemical, Printing Ink
Facility Name Division, Whitehouse,
Ohio


Executive Vice President

Signature of Executive Officer

Borden Inc.
Title

September 19, 1983
Date

WHO SHOULD SIGN THE CERTIFICATION STATEMENT?

- A. For a corporation: By a principal executive officer of at least the level of vice president;
- B. For partnership or sole proprietorship: By a general partner or the proprietor, respectively; or
- C. For a municipality, State, Federal or other public facility: By either a principal executive officer or ranking elected official.

Note: Establishment of a hazardous waste facility without an effective permit is prohibited pursuant to Sections 3734.02 and 3734.11 of the Ohio Revised Code.

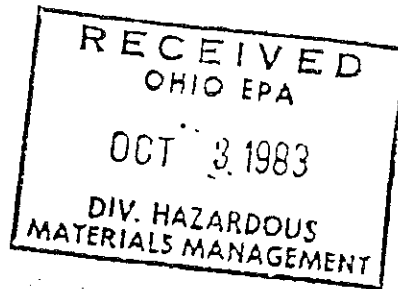
0427R

OHIO EPA

05-48-0146ED

Re: Lucas County
Hazardous Materials
Borden Chemical Printing Ink
HWFAB #03-48-0146

G



September 28, 1983

Mr. Thomas W. Shadle
Operations Manager
Borden Chemical Printing Ink
6725 Glead Street
Whitehouse, OH 43571

Dear Mr. Shadle:

On August 30, 1983, I conducted an inspection of your facility for compliance with State of Ohio Hazardous Waste Regulations. As a formality, a Generator inspection was conducted pending final determination of your ink wash. No violations were found at that time. A copy of the inspection form is enclosed for your records. As I mentioned during the time of the inspection, Federal regulation numbers are used for reference only.

I questioned your IOC from F. Rosenbloom stating that your K086 ink wash is non-hazardous since K086 is a listed hazardous waste and normally requires a formal delisting from the U.S. EPA in Washington, D.C. I discussed this with Ken Humphrey, Technical Assistance, Central Office. Our determination is that the waste is non-hazardous only if it never had chrome or lead in it.

If this is the case, your facility will remain a Small Quantity Generator. If not, you must continue to maintain Generator status. There appears to be no problem for you to ship your waste within 90 days.

If you have any questions, please call me at 352-8461.

Sincerely,

A handwritten signature in cursive script that reads "David L. Ferguson".

David L. Ferguson
Division of Hazardous Materials Management

DLF/kb

Enclosure

cc: Paula Cotter, DHMM, CO ✓

ISEP 29 1982

SNH-TUB

Mr. Thomas Heaton
Environmental Affairs
Borden, Incorporation
180 East Broad Street
Columbus, Ohio 43215

RE: OHD005043740
Borden Printing Ink Division
Whitehouse, Ohio

Dear Mr. Heaton:

This office has received the closure plan for your drum storage area located on the site of your printing Ink plant in Whitehouse, Ohio.

Before this Agency can issue final approval, we are required to issued Public Notice of closure and to consider any comments received on the manner in which closure will be completed. Public Notice should appear in Anthony Wayne Herald in Waterville, Ohio Approximately October 13, 1982, the date of the notice will commence a 30 day comment period. A draft copy of the public notice is enclosed for your information. We would like to thank you for posting the notice at the plant office, in order to facilitate public understanding, during regularly scheduled business hours.

Please contact me at (312) 886-6162 if you have further questions.

Sincerely,

Elizabeth Utley
Environmental Scientist

cc: Tom Carlisle w/plan

bcc: Part A file
Tom Golz

INITIALS
DATE

TY
fy
9/23/82

9/23/82

Stuttz
Brenasack
9-24-82

WBS
CLF

WMB
CLF

ARMED
DIRECTOR



CLOSURE AND POST-CLOSURE PLAN

FOR

BORDEN CHEMICAL COMPANY

6725 GILEAD STREET, P. O. BOX 2758

WHITEHOUSE, OHIO 43571

I. General Closure Considerations

- A. This facility consists of interdependent manufacturing processes; thus closure will occur as a unit.
- B. The facility will close upon some future closing date as yet undetermined. Closure will be completed within 90 days of generating the last volume of hazardous waste.
- C. The maximum quantity of waste in storage or treatment at any given time will not exceed process design capacities (specified on page 1, form 3, RCRA hazardous waste permit application).
- D. The facility equipment will be triple rinsed with an appropriate solvent. The residue will be properly disposed of as hazardous waste.

II. General Post-Closure Activities

- A. Security will be maintained by fence around the facility with a monthly inspection of the area.
- B. The location, quantity and type of hazardous waste at the facility will be documented by the current RCRA permit application and record keeping of subsequent activity. Any movement of hazardous waste within or from the facility will be recorded.
- C. No food chain crop will be permitted on the RCRA facility, unless no impact can be determined.
- D. These activities will continue after closure with a time that the Regional Administrator determines is sufficient.

III. Specific Closure and Post-Closure Activities for Facility

- A. Drums.
 - 1. Full drums will be transported for proper disposal.
 - 2. Empty drums in which hazardous materials have been stored will be triple rinsed with an appropriate solvent.
 - 3. Leaking drums of hazardous material will be enclosed in an over-pack drum for disposal.

- B. All equipment including pumps, tanks, mills and piping will be triple rinsed with the residue being properly disposed of.

IV. Cost Estimates

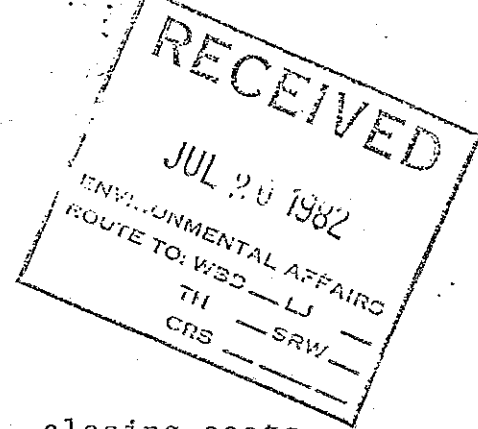
- COST BREAKDOWN* →
- A. Closure cost estimates - \$60,000 (labor
(material
(transportation and disposal
- 7 B. Post-closure costs \$25,000 (monitoring
(transportation and disposal
(contingency
- C. The cost estimates will be revised upon any change in the closure or post-closure plans.
- D. The cost estimates will be revised at least once annually using the current inflation factor.

V. Final Considerations

- A. These plans will be amended upon a change in the operating plans.
- B. These plans will be submitted to the Regional Administrator 180 days prior to anticipated closure of the facility.
- RE-OPENING
ALERT
10/12/89* [C. An independent registered professional engineer will be contracted to certify that the facility has been closed in accordance with the approved closure plan.

CLOSURE COST ESTIMATE

REVISED 12 JULY 82



Due to a product changeover at this location, closing costs are revised downward from our original estimate dated August 1981.

The current product line is a water-base system. All lead chromium and cadmium pigments have been eliminated from use. The waste system, by analysis, is not considered EP Toxic.

Closure will follow the original plan which includes properly cleaning all equipment including dust collectors, pumps, tanks, mills, and piping, etc. Any drum storage will be disposed of in an approved manner. Any spillage or penetration into the land surface will be removed and disposed of at an approved landfill. An independent registered professional engineer will be retained to certify correct closure has been accomplished.

The total revised closure cost estimate is \$20,000.

A letter of financial assurance will be available from our corporate offices.

Thomas W. Shadle,
Manager

Borden Chemical Company
Printing Ink Division
Whitehouse, Ohio

Mannik & Smith, Inc.

October 25, 1983

Borden Inc.
Environmental Affairs
165 N. Washington Avenue
Columbus, OH 43215

Attn: Mr. Thomas R. Heaton

Re: Closure Plan
Borden Chemical
Whitehouse, Ohio



Gentlemen:

Pursuant to your request, our office has reviewed the Closure and Post-Closure Plan for your Printing Ink Division facility located at 6525 Gilead Street, Whitehouse, Ohio. More specifically, our review was orientated to your September 9, 1982 request to USEPA Region V for withdrawal of your RCRA permit for the storage of hazardous waste material at this facility. The undersigned, on September 13, 1983 visited the site and was given a tour of the facility by Mr. Thomas W. Shadle, Plant Manager. At that time, there was no evidence that any hazardous waste was currently being stored on site, nor any evidence that a spill of any nature had occurred previously. It appeared that the area designated for the storage of hazardous waste material had been thoroughly cleaned and all drums and storage containers properly removed from the site.

It is our understanding that the facility is continuing to generate hazardous waste and that storage of this waste in the future will be for a period of less than 90 days.

Based on the above, I hereby certify that the drum storage area has been closed in accordance with the facility's approved closure plan.

Very truly yours,

C. Michael Smith, P.E.

hm

B70A1

cc: Mr. Thomas W. Shadle
file (2)

BORDEN CHEMICAL
DIVISION OF BORDEN INC.



November 16, 1983

USEPA, Region V
111 West Jackson Blvd
Chicago, Illinois 60604

Attention: 5HW-TUB
Mr. James Mayka

Re: OHD005043740 PAIG, TRS, TSD
Borden Chemical Printing Ink
Whitehouse, Ohio

Dear Mr. Mayka:

This letter is to inform USEPA that the undersigned has inspected the referenced site and can attest to the fact that the site has been closed in accordance to the approved closure plan submitted to your office.

In addition, conforming to 40CFR 265-115, Certification of Closure, Borden is submitting a letter from an independent professional registered engineer certifying the same.

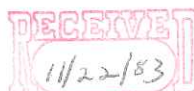
Sincerely,

BORDEN CHEMICAL COMPANY
DIVISION OF BORDEN, INC.

Thomas W. Shadle

Thomas W. Shadle,
Plant Manager

Attachment
CC: Mr. Thomas R. Heaton



6725 GILEAD STREET • WHITEHOUSE, OHIO 43571

Phone: 419 - 877-5392



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-TUB

DEC 17 1982

Mr. Thomas R. Heaton
Environmental Specialist
Borden Incorporated
180 East Broad Street
Columbus, Ohio 43215

RE: Borden Chemical, Printing Ink Div.
Whitehouse, Ohio
OHD005043740

Dear Mr. Heaton:

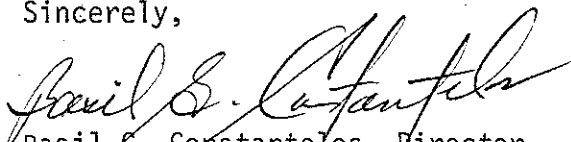
This is to inform you that the closure plan which accompanied your September 9, 1982, letter has been approved. The plan was reviewed by my staff for consistency with 40 CFR Part 265 requirements, and was subjected to a 30-day public comment period. No comments were received.

The plan proposes closure of a drum storage area at the above-referenced facility. Closure activities include the removal, for off-site disposal, of approximately 20,000 gallons of printing ink formulation wastes, and the decontamination of all associated hardware.

When closure is complete, please submit to our office the closure certifications required by 40 CFR 265.115. Please make certain that certification is provided both by an authorized representative, per 40 CFR 122.6, and by an independent registered professional engineer. Copies of the referenced regulatory sections are enclosed for your information.

Please contact James Mayka of my staff, at (312) 886-7443, if you have any questions.

Sincerely,


Basil G. Constantelos, Director
Waste Management Division

Enclosure(s)

cc: Thomas Carlisle, Chief
Technical Assistance and Waste Management Section
Ohio Environmental Protection Agency

bcc: Part A file ✓

BORDEN INC

180 EAST BROAD STREET, COLUMBUS, OHIO 43215



July 15, 1982

THOMAS R. HEATON
ENVIRONMENTAL SPECIALIST
ENVIRONMENTAL AFFAIRS

USEPA Region V
111 West Jackson Blvd.
Chicago, IL 60604

Attn: 5HW-TV8

Re: Hazardous Waste Sudden Accidental Liability Insurance

Dear Sirs:

Borden Inc. submits certificates of liability insurance
for sudden accidental occurrences for the following facilities:

Borden Chemical, Woodlawn, OH	OHD068932011
Borden Chemical, Whitehouse, OH	- OHD005043740
Borden Chemical, Delaware, OH	OHD004297834
Columbus Coated Fabrics, Cols. OH	OHD004294351
Borden Chem., St. Charles, IL	ILD064017940
Borden Chem., Illiopolis, IL	ILD005158548
Borden Chem., Cicero, IL	ILD074367434
Pet-Ag Div., Borden Inc., Hampshire, IL	ILD005468822
Borden Chem., Portage, MI	MID092950195

If you have any questions, please call the undersigned
at (614) 225-4860.

Sincerely,

Thomas R. Heaton

Thomas R. Heaton

TRH/slw

Encl.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NORTHWESTERN NATIONAL INSURANCE COMPANY
OF MILWAUKEE, WISCONSIN

HOME OFFICE: 731 NORTH JACKSON STREET / P. O. BOX 2070 / MILWAUKEE, WISCONSIN 53201 / PHONE (414) 765-8444

CERTIFICATE OF INSURANCE

The Northwestern National Insurance Company, of Milwaukee, Wisconsin, hereby certifies that it has issued liability insurance covering bodily injury and property damage to Borden Inc., and its subsidiaries, of 180 E. Broad Street, Columbus, Ohio, in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR264.147 or 265.147. This coverage applies at, those locations listed in the attached schedule for "sudden accidental occurrences". The limits of liability are \$1,000,000.00 for each occurrence and \$2,000,000.00 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number CLA234135. The effective date of said policy is July 1, 1982.

The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy of insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

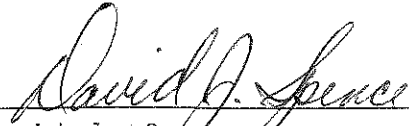
(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. The provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR264.147(f) of 265.147 (f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) in of the EPA Region(s) in which the facility (ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

A handwritten signature in cursive script, reading "David J. Spence", written over a horizontal line.

David J. Spence
Staff Assistant
Authorized Representative of
Northwestern National Insurance
731 North Jackson Street
Milwaukee, WI, 53201

SCHEDULE OF LOCATIONS

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
470 South 2nd Street
Springfield, OR 97477
ID# ORD076412444

Consumer Products Div.
Borden, Inc.
9-11 Johnson St.
Bainbridge, NY 13733
ID# NYD002234813

Krylon Department
Borden, Inc.
P.O. Box 390
Norristown, PA 19404
ID# PAD001865906

Borden Chemical
Printing Inks Division
Borden, Inc.
630 Glendale-Milford Rd.
Cincinnati, OH 45215
ID# OHD068932011

Borden Chemical
Petrochemical Division
Borden, Inc.
P.O. Box 427
Geismar, LA 70734
ID# LAD003913449

Fabric Leather Division
Borden, Inc.
40 Garvies Point Rd.
Glen Cove, NY 11542
ID# NYD008918450

Vernon Plastics Division
Borden, Inc.
Shelly Road-Ward Hill
Haverhill, MA 01830
ID# MAD001381912

Borden Chemical
Thermoplastics Division
Borden, Inc.
P.O. Box 27
Illioopolis, IL 62539
ID# ILD005158548

Borden Chemical
Printing Ink Division
6725 Gilead St.
Whitehouse, OH 43571
ID# OHD 005043740

Borden Chemical
Printing Ink Division
Borden Inc.
5004 N. Combee Rd.
Lakeland, FL 33801
ID# FLT130010069

Borden Chemical
Printing Ink Division
Borden Inc.
587 Whitehall St., S.W.
Atlanta, GA 30303
ID# GAD075880310

Borden Chemical
Printing Ink Division
Borden Inc.
1711 Osbourne St.
St. Marys, GA 31558
ID# GAD070327267

Borden Chemical Printing Ink Division
2445 Production Dr.
St. Charles, IL 60174
ID# ILD064017940

Borden Chemical
Printing Ink Division
P.O. Box 6
Odenton, MD 21113
ID# MDD003075595

Borden Chemical
Printing Ink Division
Borden Inc.
8925 Shaver Rd.
Portage, MI 49002
ID# MID 092950195

Borden Chemical
Printing Ink Division
8-10 22nd Street
Fairlawn, NJ 07410
ID# NJD 001374883

Borden Chemical
Printing Ink Division
Borden Inc.
3221 Randol Mill Rd.
Arlington, TX 76011
ID# TXD046933867

SCHEDULE OF LOCATIONS cont.

Borden Chemical
Thermoplastics Division
Borden, Inc.
511 Lancaster St.
Leominster, MA 01453
ID# MAD990886673

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
56 Nostrand Ave.
Brooklyn, NY 11205
ID# NYD012497335

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
1829 S. 54th Ave.
Cicero, IL 60650
ID# ILD074367434

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
400 Park Ave. Delaware, OH 43015
ID# OHD004297834

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
Drawer 40
Demopolis, AL 36732
ID# ALD031569940

Borden Chemical/Adhesives
and Chemical
Borden, Inc.
100 West Borden Drive
Diboll, TX 75941
ID# TXD001865609

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
41100 Boyce Rd.
Fremont, CA 94538
ID# CAD086167384

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
P.O. Box 410
Fayetteville, NC 28302
ID# NCD003189024

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
P.O. Box 428
Kent, WA 98031
ID# WAD052581568

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
P.O. Box 1028
LaGrande, OR 97850
ID# ORD003938628

Borden Chemical
Adhesives and Chemicals
Borden, Inc. 6455 E. Canning St.
Los Angeles, CA 90040
ID# CAD009536194

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
1021 Industrial Park Dr.
Marietta, GA 30062
ID# GAD042104232

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
930 Lincoln Blvd.
Middlesex, NJ 08846
ID# NJD002170439

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
3670 Grant Creek Road
Missoula, MT 59801
ID# MTD053041927

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
P.O. Box 847
Sheboygan, WI 53081
ID# WID023540263

Borden Chemical
Adhesives and Chemicals
Borden, Inc.
6200 Campground Rd.
Louisville, KY 40216
ID# KYD055832091

SCHEDULE OF LOCATIONS cont.

Borden Chemical
Printing Ink Division
T.C. Industrial Park
Depew, N.Y. 14043
ID# NYD013705587

Borden Chemical
Printing Ink Division
Borden Inc.
1100 Vail Ave.
Montebello, CA 90640
ID# CAD990662546

Borden Chemical
Printing Ink Division
Borden Inc.
1185 Research Blvd.
St. Louis, MO 63132
ID# MOD000823211

Columbus Coated Fabrics Division
Borden Inc.
1280 North Grant Avenue
Columbus, Ohio 43216
ID# OHD004294351



State of Ohio Environmental Protection Agency

Northwest District Office

North Dunbridge Road
Wilmington, Ohio 43402
(419) 352-8461 FAX (419) 352-8468

George V. Voinovich
Governor

Re: Lucas County
Hazardous Waste
OHD 005 043 740

June 30, 1994

Mr. Gerald Starkey
Borden, Inc.
1105 Schrock Road
Suite 401
Columbus, Ohio 43229

Dear Mr. Starkey:

On June 10, 1994, I met with you and Mr. James Fox, Village Administrator for the Village of Whitehouse at the former Borden facility in Whitehouse. The purpose of the meeting was to discuss the environmental and regulatory implications of demolishing the buildings which now stand on the property.

During the meeting there were two key questions asked about Ohio EPA's regulatory role in the demolition of the buildings. The first question that was asked was what role does RCRA play in demo waste? The Ohio EPA Division of Solid and Infectious Waste Management does not define demolition debris as a waste. Because it is not a waste it would not fall under the RCRA regulations, provided hazardous waste has not been mixed with the debris. The areas where RCRA does have authority to regulate would be the closure of hazardous waste storage areas.

In reviewing the information that you submitted, as well as the Agency's files, I was unable to determine if a generator closure had been conducted at the facility for the hazardous waste storage areas. Because the facility was a large quantity generator of hazardous waste, the facility is required to provide documentation to confirm that closure was completed in accordance with the closure performance standards found in OAC Rule 3745-66-11. This would also include the product storage tanks if they were not empty, as defined in the regulations, when the facility was shut down.

During our meeting you also asked what other things should Borden do to insure that the debris would be environmentally inert? I would suggest that Borden clean up the areas where there is visible staining, and dispose of that material properly.

I have included a list of demolition waste disposal sites in the Toledo area. If you have any questions, please feel free to contact me at (419) 352-8461.

Sincerely,

Timothy J. Killeen
Division of Hazardous Waste Management

/rab

pc: James C. Fox, Village of Whitehouse Administrator
Laurie Stevenson, DSHWM, CO
Cindy Lohrbach, DHWM, NWDO

NWDO File



Printed on recycled paper

(revised 12/93)



IF IT'S BORDEN-IT'S
GOT TO BE GOOD

Lucas Co
RECEIVED

JUN 21 1994

**BORDEN, INC. OHIO E.P.A.
N.W.D.O.**

June 14, 1994

Mr. Timothy J. Killeen
Ohio EPA
Division of Hazardous Waste Management
Northwest District Office
347 N. Dunbridge Road
PO Box 466
Bowling Green, OH 43402-0466

Dear Tim,

To begin, I want to thank you for taking time out of your busy schedule to meet with me on Friday at the former Borden facility in Whitehouse, Ohio.

Hopefully, as a result of that meeting, something positive can be worked out which will benefit all concerned.

Attached is a copy of the lab results of the soils which were hauled out of the facility in 1989. Also, I have included a copy of the letter received from the OEPA dated December 21, 1989.

Thanks, again, for your cooperation.

Sincerely,

G. N. Starkey

GNS:dd
Attachments

1105 SCHROCK ROAD
SUITE 401
COLUMBUS, OHIO 43229 USA
FACSIMILE: 614/431-6611



Ohio Environmental Protection Agency

Northwest District Office
1035 Devlac Grove Dr.
Bowling Green, Ohio 43402
(419) 352-8461

RECEIVED

DEC 23 1989

Borden Environmental Remediation Dept.

Richard F. Celeste
Governor

Re: Lucas County
Borden Packaging &
Industrial Products

December 21, 1989

Mr. Gerald N. Starkey
Borden Packaging and Industrial Products
1050 Kingsmill Parkway
Columbus, Ohio 43229-1143

Dear Mr. Starkey:

The Ohio EPA has reviewed the documents submitted to us regarding the remediation undertaken at the former Borden facility in Whitehouse, Ohio.

It appears that the bioremediation conducted in 1986 effectively reduced the contamination resulting from the ten excavated underground storage tanks. Also, the lead-contaminated soils appear to have been removed, and the 1989 analysis for E.P. Toxicity is acceptable.

Although this office concurs with the remediation scenario undertaken at the former Borden facility, this letter should in no way be construed to release the owner from any liability associated with past operations at this facility.

If I may be of further assistance, please contact me at (419) 352-8461.

Sincerely,

Pamela A. Doerner

Pamela A. Doerner
Division of Emergency and
Remedial Response

/ckl

cc: NWDO File

SAMPLES RECEIVED 10/06/89

LAB# 9100313 SOIL A
 LAB# 9100314 SOIL B
 LAB# 9100315 SOIL C
 LAB# 9100316 SOIL D
 LAB# 9100317 SOIL E

LAB# UNITS	9100313 mg/kg	9100314 mg/kg	9100315 mg/kg	9100316 mg/kg	9100317 mg/kg
EPA METALS, TOTALS					
Arsenic, Total	0.62	0.67	0.63	0.42	0.51
Barium, Total	72	82	92	58	72
Cadmium, Total	2.6	2.4	2.6	2.4	2.8
Chromium, Total	17.0	21	21	19	18
Lead, Total	8.1	7.6	9.7	6.6	8.1
Mercury, Total	< 0.01	0.02	< 0.01	0.03	0.02
Selenium, Total	0.09	0.06	0.08	0.05	0.07
Silver, Total	1.0	1.4	1.2	1.3	2.1
EP TOX, EPA METALS					
Arsenic, EP Tox., mg/l	< 0.50	< 0.50	< 0.05	< 0.05	< 0.50
Barium, EP Tox., mg/l	0.19	0.17	0.19	0.25	0.18
Cadmium, EP Tox., mg/l	0.03	0.01	< 0.01	< 0.01	< 0.01
Chromium, Tot., EP Tox, mg/l	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02

COUSINS WASTE CONTROL CORP.
CAL REPORT# 4325

PA(

S. LES RECEIVED 10/11/89

LAB# 9100577 BORDEN F
LAB# 9100578 BORDEN G
LAB# 9100579 BORDEN H
LAB# 9100580 BORDEN I

LAB#	9100577	9100578	9100579	9100580	ANALYTICAL METHOD
EP TOX, EPA METALS					EPA 1310
Arsenic, EP Tox., mg/l	< 0.50	< 0.50	< 0.50	< 0.50	EPA 7061
Barium, EP Tox., mg/l	0.31	0.61	0.14	0.18	EPA 6010
Cadmium, EP Tox., mg/l	< 0.01	0.03	< 0.01	< 0.02	EPA 6010
Chromium, Tot., EP Tox, mg/l	< 0.02	0.10	0.02	< 0.02	EPA 6010
Lead, EP Tox., mg/l	< 0.10	0.22	0.18	0.17	EPA 6010
Mercury, EP Tox., mg/l	0.07	0.04	< 0.01	0.02	EPA 7470
Selenium, EP Tox., mg/l	< 1.0	0.22	< 1.0	< 1.0	EPA 7741
Silver, EP Tox., mg/l	< 0.10	< 0.10	0.02	0.01	EPA 6010

COUSINS WASTE CONTROL CORP.
CAL REPORT# 4264

PAGE 2

SAMPLES RECEIVED 10/06/89

9100317

9100316

9100315

9100314

9100313

LAB#

Lead, EP Tox., mg/l	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Mercury, EP Tox., mg/l	< 0.003	< 0.003	< 0.003	< 0.003	< 0.003
Selenium, EP Tox., mg/l	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Silver, EP Tox., mg/l	0.03	0.02	0.02	0.03	0.02



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

RECEIVED

*Borden
Lucas Co*

JUN 15 1994

OHIO E.P.A.
N.W.D.O.

George V. Voinovich
Governor

MEMORANDUM

TO: Tim Killeen, NWDO
FROM: Paula Canter, CO *PC*
RE: Borden Chemical
DATE: June 14, 1994

Attached per your request are historical Annual Report printouts on Borden Chemical at 6725 Gilead Road, Whitehouse (OHD005043740). Borden notified as a LQG in 1980. Generator Reports were filed for 1981-1986, 1988, and 1989. It may be worthwhile to call Michigan DNR to find out if shipments were made to that state in 1987; I can give you the phone number and contact person for the Manifest Unit if you need it. They ~~may~~ have been idle in 1987 if they closed around that time.

I also checked Ohio TSD data for 1987 and 1990-1992 to see if any shipments were reported from Borden Chemical. The only record I found was on Chemtron's 1992 Facility Report (printout attached).

I have printouts from Michigan DNR for 1989-1992. I checked 1990-1992 and found only one record for Borden Chemical in those years, which was a 1992 shipment of 550 pounds of D008 waste.

That's all! Call me if you have questions. See you next week.

HAZARDOUS WASTE GENERATED AND SENT OFF-SITE
ALPHA WITHIN COUNTY

COUNTY: LUCAS
GENERATOR NAME/LOCATION/MAILING ADDRESS

BORDEN CHEMICAL PRINTING INK
5725 GILEAD ST
WHITEHOUSE

OH 43571- A

PO BOX 2758
WHITEHOUSE
OH 43571-1682

GENERATOR ID: DHD005043740
CONTACT NAME/PHONE: SHADLE THOMAS W 419-877-5392

SIC: 2893 CHEMICALS & ALLIED PRODUCTS

TSD NAME/ID/LOCATION
US CHEMICAL CORP
29163 CALLAHAN ST
ROSEVILLE
MID006523385

MI 48066

USEPA WASTE CODES
K086
WASTE KEY AND DESCRIPTION
01 HAZARDOUS WASTE LIQUID

DOT AMOUNT/UNIT
12 73,000 P

TSD NAME/ID/LOCATION
CHEM-WET SERVICES INC
18550 ALLEN RD
WYANDOTTE
MID096963194

MI 48192

USEPA WASTE CODES
K086
WASTE KEY AND DESCRIPTION
01 HAZARDOUS WASTE LIQUID
02 HAZARDOUS WASTE SOLID

DOT AMOUNT/UNIT
12 155,800 P
12 14,025 P

TSD NAME/ID/LOCATION
GENERAL PORTLAND / SYSTECH
PO BOX 256
PAULDING
DHD005046947

OH 45879

USEPA WASTE CODES
K086
WASTE KEY AND DESCRIPTION
01 HAZARDOUS WASTE LIQUID
GENERATOR TOTAL WASTE IN TONS ROUNDED

DOT AMOUNT/UNIT
12 43,800 P
12 143.3 T

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT
1982 GENERATOR ANNUAL REPORT

06/14/94
HRCNCTV

HAZARDOUS WASTE GENERATED AND SENT OFF-SITE
ALPHA WITHIN COUNTY

COUNTY: LUCAS
GENERATOR NAME/LOCATION/MAILING ADDRESS

BORDEN CHEMICAL PRINTING INK
6725 GILEAD ST
WHITEHOUSE

OH 43571- A

PO BOX 2758
WHITEHOUSE
OH 43571-1682

GENERATOR ID: OHDD05043740
CONTACT NAME/PHONE: SHADLE THOMAS W 419-877-3392

SIC: 2893 CHEMICALS & ALLIED PRODUCTS

TSD NAME/ID/LOCATION
CHEM-MET SERVICES
18550 ALLEN RD
WYANDOTTE MI 48192
MID09663194

USEPA WASTE CODES
K086
WASTE KEY AND DESCRIPTION
01 PRINTING INK WASTE
DOT 12
AMOUNT/UNIT
28,900 P
14.4 T

GENERATOR TOTAL WASTE IN TONS ROUNDED

06/14/94
HAZGENCTV

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT
1984 GENERATOR ANNUAL REPORT

PAGE 1

HAZARDOUS WASTE GENERATED AND SENT OFF-SITE
ALPHA WITHIN COUNTY

COUNTY: LUCAS
GENERATOR NAME/LOCATION/MAILING ADDRESS

BORDEN CHEMICAL PRINTING INK
9725 GILEAD ST
WHITEHOUSE OH 43571-

P.O. BOX 2758
WHITEHOUSE OH 43571-

GENERATOR ID: OHDD05043720
CONTACT NAME/PHONE: BUTLER CAROL 419-877-5392

SIC: 2893 CHEMICALS & ALLIED PRODUCTS

TSI NAME/ID/LOCATION
CHEM MET SERVICES WYANDOTTE MI 48192
18550 ALLEN ROAD

USEPA WASTE CODES
D001 WASTE KEY AND DESCRIPTION
01 HAZARDOUS WASTE SOLID

TSI NAME/ID/LOCATION
PETRO CHEM PROCESSING DETROIT MI 48124
421 LYCASTE

USEPA WASTE CODES
D001 WASTE KEY AND DESCRIPTION
01 WASTE FLAMMABLE LIQUID
GENERATOR TOTAL WASTE IN TONS ROUNDED

DOT AMOUNT/UNIT
07 422,400 P
12 18,260 P
30.3 T

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT
1983 GENERATOR ANNUAL REPORT

HAZARDOUS WASTE GENERATED AND SENT OFF-SITE
ALPHA WITHIN COUNTY

COUNTY: LUCAS
GENERATOR NAME/LOCATION/MAILING ADDRESS

BORDEN CHEMICAL PRINTING INK

6725 GILEAD ST

OH 43571-

WHITEHOUSE

PO BOX 2758

WHITEHOUSE

OH 43571-

GENERATOR ID: OH0005043740

CONTACT NAME/PHONE: SHADLE THOMAS W

419-877-0386

SIC: 2893 CHEMICALS & ALLIED PRODUCTS

TSD NAME/ID/LOCATION

CHEM-MET SERVICES

18550 ALLEN ROAD

WYANDOTTE

MID096963194

MI 48192

USEPA WASTE CODES

K086

WASTE KEY AND DESCRIPTION
OF PRINTING INK WASTE

DOT AMOUNT/UNIT
12 8,300 P

GENERATOR TOTAL WASTE IN TONS ROUNDED

4.1 T

COUNTY: LUCAS
GENERATOR NAME/LOCATION/MAILING ADDRESS

BORDEN CHEMICAL ADHESIVES & GRAPHICS D
6725 GILEAD STREET
WHITEHOUSE OH 43571-

165 N. WASHINGTON AVE
COLUMBUS OH 43215-

GENERATOR ID: OH0005063760
CONTACT NAME/PHONE: SPRINGER RICK 614-225-4298

SIC: 2893 CHEMICALS & ALLIED PRODUCTS

TSD NAME/ID/LOCATION
MICHIGAN DISPOSAL
49350 N SERVICE DRIVE BELLEVILLE MI 48111 MID000724831

USEPA WASTE CODES	WASTE KEY AND DESCRIPTION	DOT	AMOUNT/UNIT
0001	01 IGNITABLE WASTE LIQUID WASTEWATER	01	124,000 P
0008	02 HAZARDOUS WASTE LIQUID INK WASTES	12	72,169 P
0008	03 HAZARDOUS WASTE SOLIDS INK WASTES	12	4,533 P

TSD NAME/ID/LOCATION
CHEM-MET SERVICES
18550 ALLEN ROAD WYANDOTTE MI 48192 MID096963194

USEPA WASTE CODES	WASTE KEY AND DESCRIPTION	DOT	AMOUNT/UNIT
0001	01 IGNITABLE LIQUID NOS	01	90,560 P
0008	02 HAZARDOUS WASTE LIQUID	12	208 P
0008	03 HAZARDOUS WASTE SOLIDS	12	34,025 P

TSD NAME/ID/LOCATION
PETRO-CHEM PROCESSING
421 LYCASTE ST DETROIT MI 48214 MID980615298

USEPA WASTE CODES	WASTE KEY AND DESCRIPTION	DOT	AMOUNT/UNIT
0001	01 WASTE FLAMMABLE LIQUID	07	13,520 P
0003	02 WASTE FLAMMABLE LIQUID	07	40 P
GENERATOR TOTAL WASTE IN TONS, ROUNDED			169.5 T

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT
1995 GENERATOR ANNUAL REPORT

HAZARDOUS WASTE GENERATED AND SENT OFF-SITE
ALPHA WITHIN COUNTY

COUNTY: LUCAS
GENERATOR NAME/LOCATION/MAILING ADDRESS

BORDEN CHEMICAL ADHESIVES & GRAPHICS D
6725 GILEAD STREET
WHITEHOUSE OH 43071-

165 N WASHINGTON AVE
COLUMBUS OH 43215-

GENERATOR ID: OHDO05043740

CONTACT NAME/PHONE: HEATON TOM 614-225-4860

SIC: 2893 CHEMICALS & ALLIED PRODUCTS

TSD NAME/ID/LOCATION
MICHIGAN DISPOSAL 49350 N SERVICE DRIVE BELLEVILLE MI 48111
MID000724831

USEPA WASTE CODES	WASTE KEY AND DESCRIPTION	DOT	AMOUNT/UNIT
D008	01 HAZARDOUS WASTE LIQUID WASTE INK NOS	12	54,320 P
D008	02 HAZARDOUS WASTE SOLID WASTE INK NOS	12	4,208 P
	GENERATOR TOTAL WASTE IN TONS, ROUNDED		29.2 T

HAZARDOUS WASTE GENERATED AND SENT OFF-SITE
ALPHA WITHIN COUNTY

COUNTY: LUCAS
GENERATOR NAME/LOCATION/MAILING ADDRESS

BORDEN PACKAGING & INDUSTRIAL PRODUCTS
6725 GILEAD ST OH 43571-
WHITEHOUSE
1050 KINGSMILL PKWY OH 43229-
COLUMBUS

GENERATOR ID: OHDD05063740 614-431-6666
CONTACT NAME/PHONE: STARKER GERRY

SIC: 2893 CHEMICALS & ALLIED PRODUCTS

TSD NAME/ID/LOCATION MID048090633 MI 48111
WAYNE DISPOSAL INC BELLEVILLE
49350 N SERVICE DRIVE
USEPA WASTE CODES D008

WASTE KEY AND DESCRIPTION DOT AMOUNT/UNIT
01 HAZARDOUS WASTE SOLID NOS ORW-E NA 9189 12 384 T
GENERATOR TOTAL WASTE IN TONS ROUNDED 381.0 T

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT
1985 GENERATOR ANNUAL REPORT

HAZARDOUS WASTE GENERATED AND SENT OFF-SITE
ALPHA WITHIN COUNTY

COUNTY: LUCAS
GENERATOR NAME/LOCATION/MAILING ADDRESS

BORDEN CHEMICAL- ADHESIVES & GRAPHICS
6725 GILEAD STREET
WHITEHOUSE OH 43571-

165 N WASHINGTON AVE
COLUMBUS OH 43215-

GENERATOR ID: OH0005043740

CONTACT NAME/PHONE: GARY TONG

614-225-7585

SIC: 2893 CHEMICALS & ALLIED PRODUCTS

TSD NAME/ID/LOCATION
CHEM-NET SERVICES
18550 ALLEN RD

MID096963194

WYANDOTTE

MI 48192

USEPA WASTE CODES	WASTE KEY AND DESCRIPTION	DOT	AMOUNT/UNIT
D008	01 HAZARDOUS WASTE SOLID	12	2,941 P
D001	02 WASTE COMBUSTIBLE LIQUID	01	3,744 P
	GENERATOR TOTAL WASTE IN TONS ROUNDED		3.3 T

06/14/94
HWFACCTV
OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT
1992 FACILITY ANNUAL REPORT
HAZARDOUS WASTE FACILITIES
ALPHA WITHIN COUNTY

COUNTY: LORAIN
FACILITY : CHEMTRON CORP.

CONFIDENTIAL: N

CHEMTRON CORP.
35850 SCHNEIDER CT.
AVON

FACILITY ID: OH006060609
CONTACT NAME: GUENTHER, RON
PHONE NUMBER: 216-871-8048

OH 44011-

35850 SCHNEIDER CT.
AVON

OH 44011-

SIC: 7389 BUSINESS SERVICES

GEN: BORDEN
6725 GILEAD STREET

OH0005043740

WHITEHOUSE

OH 43571

EPA WASTE CODES
0002.F001

WASTE KEY AND DESCRIPTION

01 METHYLENE CHLORIDE & FORMIC ACID/CORROSIVE

HANDLING CODE DESCRIPTION

S01 STORAGE CONTAINER

FACILITY TOTAL WASTE IN TONS ROUNDED

AMOUNT/UNIT

342 P

0.1 T

OHIO EPA

Inter-Office Communication

TO: Paula Cotter, DHMM/CO

FROM: Jeffrey Moler

SUBJECT: Borden Chemical - Graphics Div.

OHIO 005 043 740

16m. it
C.A.

RECEIVED DATE: November 30, 1982 OHIO EPA
DEC 1 1982
DIV. HAZARDOUS MATERIALS MANAGEMENT

On 24 November 1982, I reinspected Borden Chemical - Graphics Div. to determine compliance to violations listed in my letter of 14 September 1982.

The leaking containers were still on-site. At this time the weather was cold enough that the material had solidified. The material was over a quarter inch ($\frac{1}{4}$ ") thick on the outside of containers on three pallets. The pallets were also covered with the varnish waste. At least six (6) pallets were visibly broken and the majority in extremely poor condition.

All rings had been replaced and lids at least visibly secured.

The number two lagoon had more grass than previously, but the top of the containment structure was not covered. A portion (~15%) had no ground cover due to excavation of buried pipes. There was about one foot of freeboard in the lagoon. The reasons given were: full scale production during the previous day and evening in one section and failure of the lagoon pump. The lagoon pump was being repaired while I was there.

Two pallets of containers with 1,1,1-trichloroethane spent solvent had areas of spilled solvent around them during the 24 November 1982 inspection.

Rosenbloom and Scott, representatives of Borden Chem, indicated the containers, indicated previously, would be disposed of on a priority basis. Inspection of the Inspection Log showed that during the last two inspections when leaking containers had been found the log indicated that there were no leakers and did not show any remedial actions taken.

I recommend that:

- 1) Additional training of inspectors of storage areas of both lagoons and containers,
- 2) Immediate ground cover for containment structure of lagoon two,
- 3) Replacement of worn and damaged pallets,
- 4) Disposal of all waste coated drums and damaged drums, and
- 5) Revision of inspection program to insure proper inspections, reporting of inspections and measures to insure remedial action is taken.

RECEIVED
SEP 15 1983
WASTE MANAGEMENT
BRANCH

If you have any additional requirements, don't hesitate to add them. A memo from Bruce Midolo is attached concerning the ground water monitoring program if you want to include that material.

JM:bjg

Attachment

ChicEP[®] Inter-Office Communication

TO: Jeff Moler DATE: November 30, 1982

FROM: Bruce Midolo *BAM*

SUBJECT: Borden Chemical's Groundwater Monitoring Program/Geohydrologic Assessment

Below is a list of problems I find with Borden Chemical's Groundwater Monitoring Program:

1. In Borden's geohydrologic assessment groundwater movement is stated to be in a westerly to southwesterly direction. However, Table 1, showing static water level elevations dispute westerly movement. Monitor wells #8, #6, #5 and #4 are aligned in a north to south configuration, with monitor well #8 recording a static water level of 551.1 ft. in the north and monitor well #4 recording a static water level of 615.0 ft. in the south. This strongly suggests a northerly groundwater flow.
2. If groundwater flow is to the north rather than to the southwest, upgradient and downgradient well designations, used to determine background contamination are seriously miscalculated.
3. Regardless of which monitor wells are upgradient or downgradient, there are still significant problems. A review of Borden's quarterly groundwater monitoring data reveals no pattern or correlation in the contamination levels of the different monitor wells. All monitor wells appear to be contaminated with several elements, their concentrations jumping up and down within each monitor well as well as between monitor wells. No group of or single monitor well(s) appear to represent background concentration levels, regardless of groundwater flow. I feel this is because monitor wells #8, #6, #5 and #3 are most likely located too close to Borden's impoundment areas, and are affected by the mound of groundwater recharge from them. Monitor wells #7, #4, #2 and #1, which would be expected to be uncontaminated, are contaminated. This may be due to improper sampling or contamination of the wells with surface material at the time of installation.
4. The permeability rates calculated for the Borden site in general and particularly in the glacial till appear to be under rated.

BAM:bjg

OhioEPA

Re: Lucas County
Hazardous Materials
Borden Chemical Printing Ink
HWFAB #03-48-146

Thomas W. Shadle
Plant Manager
6725 Gilead Street
Whitehouse, OH 43571

September 2, 1982

Dear Mr. Shadle:

On June 28, 1982, I conducted a RCRA Interim Status Standards inspection of your facility which was represented by you. The facility was found to be in compliance with all applicable State and Federal regulations.

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

A copy of the form completed during the inspection is enclosed. If you have any questions about the inspection, please call me at 352-8461.

Sincerely,



David L. Ferguson
Environmental Scientist

DLF/kb

Enclosure

cc: Kathy Homer, U.S. EPA, Region V w/encl. ✓
cc: Paula Cotter, DHM, CO w/encl.

RECEIVED

SEP 8 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHD 005043740

Facility: Borden Chem / Print Ink Address: 6725 Gilead St. City: Whitehouse

State: OH Zip Code: 43571 County: Lucas Telephone: (419) 877-5392

Facility Operator: Same as above Title: _____ Telephone: _____

Facility Owner: Borden Inc. Address: 180 E. Broad St.

City: Columbus State: OH Zip Code: 43215 Telephone: (614) 225-4000

Type of Ownership: ☒ Private ☐ Government State HWFAB No. 03-48-146

Date of Inspection: 6-28-82 Time of Inspection: (Start) _____ (Finish) _____

Advance Notification? ☐ No ☒ Yes: _____

Weather Conditions: _____

INSPECTION PARTICIPANT(S)

(Name)

(Title)

(Telephone)

1. Thomas W. Shadle Plant Manager 417-877-5392

2. _____

3. _____

4. _____

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

(Name)	(Title)	(Telephone)
1. <u>Dave Ferguson</u>	<u>Environmental Scientist</u>	<u>(419) 352-8461</u>
2. _____	_____	_____
3. _____	_____	_____
4. _____	_____	_____

1. Type(s) of hazardous waste site activity: A. _____ Generation B. ☒ Storage C. _____ Treatment
D. _____ Transportation E. _____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: K086

b) Non-Listed Wastes: D001 I D002 C D003 R D000 T

3. Has this facility submitted a Part A Permit Application? ☒ Yes _____ No _____
4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?
Yes, See Remark # ✓ No _____

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?
____ Yes, See Remark # ____ ☒ No
6. Does this facility transport hazardous waste materials off-site for itself or other generators?
____ Yes, Complete Part 3 (Transp.) ☒ No
- a) Applicable U.S. EPA I.D. Number _____
- b) Ohio P.U.C.O. GR TRSF Number _____
7. A brief description of site activity:

The mixing, blending and dispersing of colorants into printing inks and servicing of the printing industry.

REMARKS, PART 1. (GENERAL INFORMATION)

This facility intends to withdraw their permit.

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
 C: Preparedness and Prevention
 D: Contingency and Emergency
 E: Manifest/Records/Reporting
 F: Ground Water Monitoring
 G: Closure
 H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) 24 hour surveillance system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	AD1 Alarm
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	✓	—	—	—
a) Inspect emergency equipment.	✓	—	—	—
b) Inspect monitoring equipment.	✓	—	—	—
c) Inspect security, alarm and communications devices.	✓	—	—	—
d) Inspect process equipment (pipes, pumps, etc.).	✓	—	—	—
e) Inspect containment structures (dikes, curbs, etc.).	✓	—	—	—
f) Inspect facility for structural malfunctions (roof, floor, etc.).	✓	—	—	—
g) Inspect hazardous waste handling/loading areas each day used.	✓	—	—	—
h) Record of any malfunctions due to equipment or operator errors.	✓	—	—	—
i) Record of any hazardous waste discharges.	✓	—	—	—
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	✓	—	—	—
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	✓	—	—	—
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 <u>Subpart C: Preparedness and Prevention</u>				
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Internal alarm system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Access to telephone, radio or other device for summoning emergency assistance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Portable fire control equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
 <u>Subpart D: Contingency and Emergency</u>				
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Actions to be taken by personnel in the event of an emergency incident.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Arrangements or agreements with local or state emergency authorities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-8-1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) The estimated (or actual) weight, volume or density of the waste material(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Records of any waste analyses and trial tests required to be performed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).

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NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).

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RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	—	—	—	—
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	—	—	—	—
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	—	—	—	—
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	—	—	—	—

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:	—	—	—	—
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

- b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.
- c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

Yes No N/A Remark #

1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)
 - a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).
 - b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.
 - c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.
 - d) A description of steps taken to decontaminate facility equipment.
 - e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	—	✓	—
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	—	—	✓	—
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	—	—	✓	—
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	—	—	✓	—
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	—	—	✓	—
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> DISPOSAL FACILITIES.				
5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	—	—	✓	—
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	—	—	—	—
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	—	—	—	—
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	—	—	—	—

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Yes No N/A Remark #

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.



Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).



NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51, -52-53).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	Yes	No	N/A	Remark #
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-foot cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.

2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).

3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).

4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).

5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).

a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.

b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

RCRA INTERIM STATUS INSPECTION FORM

[illegible]

6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).
 - a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.
 - b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).

- a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.

- b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.

7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).

8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).

9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).



Re: Application Number 81-HW-0146
Lucas County

September 3, 1981

Thomas W. Shadle
Lab Production Manager
Borden Chemical
6725 Gilead Street
Whitehouse, Ohio 43591

Dear Mr. Shadle:

On August 26, 1981, Dave Ferguson of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by yourself.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script, reading "Paul Flanigan".

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Dave Ferguson, NWDO

CERTIFIED MAIL

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 81-HW-0146
 OWNER - *Borden Incorporated*
 FACILITY NAME - *Borden Chemical Printing Ink*
 FACILITY LOCATION - *6725 Gilead Street Whitehouse, Ohio 43571*
 FACILITY CONTACT - *T.W. Shadle Lab Production Mgr* PHONE NO. - *419/877-5392*
 ISS INSPECTION DATE - *Aug 26, 1981*

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
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	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13			
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"			
	D 1	3745-55-15	265.15			
	2	"	"			
	3	"	"			
4	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
	2	"	"			
	3	"	"			
5	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
6	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

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7	B 1	3745-55-53	265.53			
	C 1	3745-55-55	265.55			
	2	"	"			
	3	"	"			
	D 1	3745-55-56	265.56			
VI	A 1	3745-55-71	265.71			
	2	"	"			
	B 1	3745-55-72	265.72			
8	C 1	3745-55-73	265.73			
	2b	"	"			
	c	"	"			
	d	"	"			
	e	"	"			
	f	"	"			
	g	"	"			
9	VII A 1	3745-56-03	265.112			
	2	"	"			
	3	"	"			
	4	3745-56-32	265.142			
	B 1	3745-56-09	265.118			
	VIII I 1	3745-56-51	265.171			
	2	3745-56-52	265.172			
	3	3745-56-53	265.173			
	4	"	"			
	5	3745-56-54	265.174			
	6	3745-56-56	265.176			
10	7	3745-56-57	265.177			
	8	"	"			
	J 1	3745-56-72	265-192			
	2	"	"			
	3	"	"			
	4	3745-56-73	265-193			
	5	3745-56-74	265.194			
	6	3745-56-78	265.198			
	7	3745-56-79	265.199			
11	8	3745-56-78	265.198			
	K 1	3745-57-03	265.222			
	2	3745-57-04	265.223			
	3	3745-57-06	265.225			
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		2	3745-57-32	265.252		
		3		265.258		
		4	3745-57-36	265.256		
		5	"	"		
		6	3745-57-37	265.257		
13	M	7	3745-57-37	265.257		
		1	3745-57-52	265.272		
		2	"	"		
		3	3745-57-53	265.273		
		4	3745-57-56	265.276		
		5	3745-57-58	265.278		
		6	3745-57-58	265.278		
		7	3745-57-59	265.279		
		8	3745-57-61	265.281		
14	N	A	1	3745-57-72	265.302	
			2	"	"	
			3	"	"	
			4	"	"	
		B	1	3745-57-79	265.309	
			2	"	"	
		C	1	3745-56-03	265.112	
			2	"	"	
			3	"	"	
			4	3745-56-32	265.192	
		D	1	3745-57-82	265.312	
				3745-55-17	265.17(b)	
15	E	1	3745-57-83	265.313		
		2	3745-55-17	265.17(b)		
	F	1	3745-57-84	265.314		
		2	"	"		
		3	"	"		
		4	"	"		
	G	1	3745-57-85	265.315		
	I	B	1	3745-58-33	265.373	
			2	"	"	
			3	"	"	
			4	"	"	
			5	"	"	
16	II	A	1a	3745-58-35	265.375	
			b	"	"	
			c	"	"	
			2a	3745-58-35	265.375	
			b	"	"	
			B	1	"	
			2	"	"	
			3	"	"	
			4	"	"	
			5	"	"	

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	Use
	III A 1	3745-58-37	265.377			
	B 1	"	"			
	C 1	"	"			
	D 1	"	"			
	E 1	"	"			
	F 1	"	"			
	G 1	"	"			
18	IV A 1	3745-58-42	265.382			
	2	"	"			
	Q 1	3745-58-51	265.401			
	2	"	"			
19	3	3745-58-52	265.402			
	4	3745-58-53	265.403			
	5	3745-58-55	265.405			
	6	3745-58-56	265.406			
	IX I (A)	3745-52-40	262.40			
	(B) 1	3745-52-21	262.21			
	2	"	"			
20	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	3745-52-42	262.42			
	(C)	3745-52-30	262.30			
	2 (A)	3745-52-31	262.31			
	(B)	3745-52-33	262.33			
	(C)	3745-52-34	262.34			
21	3 1	"	"			
	2	"	"			
	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23 X	I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

KEY TO CODED ITEMS (COLL IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 20 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

STATE IDENTIFICATION NUMBER

87-HW-

0146

EPA IDENTIFICATION NUMBER

CHDC05043740

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: Borden Chemical Printing Ink
(B) Street: 6725 Gilead St.
(C) City: Whitehouse (D) State: OH (E) Zip Code: 43571
(F) Phone: 419-777-5392 (G) County: LUGGS
(H) Operator: Same as above
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: Borden Inc.
(P) Street: 170 E. Broad St.
(Q) City: Cos (R) State: OH (S) Zip Code: 43215
(T) Phone: 1-14-225-4000 (U) County: Franklin
(V) Date of Inspection: 8-26-81 (W) Time of Inspection (From) 10:00 (To) 12:00
(X) Weather Conditions: Fair 80°

(Y) Person(s) Interviewed	Title	Telephone
<u>Thomas W. Shadde</u>	<u>Lab/Production Mgr</u>	<u>414-67-3372</u>
_____	_____	_____
_____	_____	_____
(Z) Inspection Participants	Agency/Title	Telephone
<u>Dave Ferguson</u>	_____	_____
_____	_____	_____
_____	_____	_____
(AA) Preparer Information		
Name	Agency/Title	Telephone
<u>Dave Ferguson</u>	<u>CEPA, ES</u>	<u>414-353-2461</u>
_____	_____	_____

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|--|
| <p><u> </u> A. Storage and/or Treatment</p> <p> <u> </u> 1. Containers (I)</p> <p> <u> </u> 2. Tanks (J)</p> <p> <u> </u> 3. Surface Impoundments (K)</p> <p> <u> </u> 4. Waste Piles (L)</p> <p><u> </u> B. Land Treatment (M)</p> <p><u> </u> C. Landfills (N)</p> | <p><u> </u> D. Incineration and/or Thermal Treatment (O and P)</p> <p><u> </u> E. Chemical, Physical, and Biological Treatment (Q)</p> |
|---|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

Yes No NI* Remark

(A) Has the Regional Administrator been notified regarding:

1. Receipt of hazardous waste from a foreign source? N/A X — _____

2. Facility expansion? N/A X — _____

(B) General Waste Analysis:

1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? X — — _____

2. Does the owner or operator have a detailed waste analysis plan on file at the facility? X — — _____

3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? X — — _____

(C) Security - Do security measures include: (if applicable)

1. 24-Hour surveillance? — X — ADT Alarm

2. Artificial or natural barrier around facility? X — — _____

3. Controlled entry? X — — _____

4. Danger sign(s) at entrance? — X — On Order

(D) Do Owner or Operator Inspections Include:

1. Records of malfunctions? X — — _____

2. Records of operator error? X — — _____

3. Records of discharges? X — — _____

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<u>X</u>	---	---	-----
5. Safety, emergency equipment?	<u>X</u>	---	---	-----
6. Security devices?	<u>X</u>	---	---	-----
7. Operating and structural devices?	<u>X</u>	---	---	-----
8. Inspection log?	<u>X</u>	---	---	-----
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<u>X</u>	---	---	-----
2. Job descriptions?	<u>X</u>	---	---	-----
3. Description of training?	<u>X</u>	---	---	-----
4. Records of training?	<u>X</u>	---	---	-----
5. Have facility personnel received required training by 5-19-81?	<u>X</u>	---	---	-----
6. Do new personnel receive required training within six months?	<u>X</u>	---	---	-----
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<u>X</u>	---	---	-----
2. No smoking signs?	<u>X</u>	---	---	-----
3. Separation and protection from ignition sources?	<u>X</u>	---	---	-----

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes	No	NI*	Remarks
-----	----	-----	---------

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

X

2. Telephone or 2-way radios at the scene of operations?

X

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X

Indicate the volume of water and/or foam available for fire control:

On City Water

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

X _____

2. Is emergency equipment maintained in operable conditions?

X

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

X

Furax, length inspection

(E) Is there adequate aisle space for unobstructed movement?

X — —

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X — —

X — —

X — —

X — —

X — —

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<u>X</u>	—	—	—
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<u>X</u>	—	—	—
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	—	—	—
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	—	—	—
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	—	—	<u>X</u>	—

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<u>X</u>	—	—	<u>Chem H&T, Wyandot, MI</u>
2. Are records of past shipments retained for 3 years?	—	—	—	<u>(Must be in future)</u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<u>X</u>	—	—	—

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

X — — —

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

X — — —

c. The location and quantity of each hazardous waste within the facility?

X — — —

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A — — —

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X — — —

f. Reports detailing all incidents that required implementation of the Contingency Plan?

N/A — — —

g. All closure and post closure costs as applicable? (Effective 5-19-81)

X — — —

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<u>X</u>	—	—	_____
2. Has this plan been submitted to the Regional Administrator	—	<u>X</u>	—	_____
3. Has closure begun?	—	<u>X</u>	—	_____
4. Is closure estimate available by May 19, 1981?	<u>X</u>	—	—	_____
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	—	—	<u>N/A</u>	_____

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: <u>Boston</u>	Date of Inspection: <u>8-16-81</u>
------------------------------	------------------------------------

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>X</u>	—	—	_____
2. Are containers compatible with waste in them?	<u>X</u>	—	—	_____
3. Are containers stored closed?	<u>X</u>	—	—	_____
4. Are containers managed to prevent leaks?	<u>X</u>	—	—	_____
5. Are containers inspected weekly for leaks and defects?	<u>X</u>	—	—	_____
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<u>X</u>	—	—	_____

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	_____	_____	_____	_____

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	_____	_____	_____	_____
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	_____	_____	_____	_____
3. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	_____	_____	_____	_____
5. Are required daily and weekly inspections done?	_____	_____	_____	_____
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
4. Are inspection procedures followed according to 265.403?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
5. Are the special requirements fulfilled for ignitable or reactive wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>X</u>	—	—	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>X</u>	—	—	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	—	—	
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	—	—	
7. Required certification?	<u>X</u>	—	—	
8. Required signatures?	<u>X</u>	—	—	
(C) Does the owner or operator submit exception reports when needed?	<u>X</u>	—	—	

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	—	—	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<u>X</u>	—	—	
(C) If required, are placards available to transporters of hazardous waste?	<u>X</u>	—	—	

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<u>X</u>	—	—	_____
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<u>X</u>	—	—	_____

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	—	—	—	_____
--	---	---	---	-------

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	—	—	—	_____
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	—	—	—	_____
c. Met the Manifest requirements?	—	—	—	_____
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	—	—	—	_____

*Not Inspected

FORM 1		U.S. ENVIRONMENTAL PROTECTION AGENCY		EPA I.D. NUMBER	
GENERAL		GENERAL INFORMATION		FOH D 0050437403	
LABEL ITEMS		Consolidated Permits Program (Read the "General Instructions" before starting.)		GENERAL INSTRUCTIONS	
I. EPA I.D. NUMBER		PLEASE PLACE LABEL IN THIS SPACE		If a preprinted label has been provided, affix it in the designated space. Review the information carefully. If any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
FACILITY NAME					
FACILITY MAILING ADDRESS					
FACILITY LOCATION					

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X"			SPECIFIC QUESTIONS	MARK "X"		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	Borden Chemical Printing Ink Div of Borden
---	------	--

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	Shadle, TW Lab Production Mgr.	419	877 5392

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	6725 Gilead Street	4	Whitehouse	OH	43571

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN		D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	Same	6	LUCAS	6	WHITEHOUSE	OH	43571	095

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
C	7	2, 8, 9, 3	(specify)	C	7		(specify)
13	16	19		13	16	19	
C. THIRD				D. FOURTH			
C	7		(specify)	C	7		(specify)
13	16	19		13	16	19	

VIII. OPERATOR INFORMATION

A. NAME															B. Is the name listed in Item VIII-A also the owner?														
C	8	B	o	r	d	e	n	I	n	c						<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO													
13	16											13	16																
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)															D. PHONE (area code & no.)														
F = FEDERAL M = PUBLIC (other than federal or state) P (specify)															C A 6 1 4 2 2 5 4 0 0 0														
S = STATE O = OTHER (specify)															15 16 18 19 21 22 23 25														
P = PRIVATE																													
E. STREET OR P.O. BOX																													
1 8 0 E. Broad Street																													
F. CITY OR TOWN G. STATE H. ZIP CODE IX. INDIAN LAND																													
B C o l u m b u s															O H					4 3 2 1 5					Is the facility located on Indian lands?				
																									<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)														
C	9	N													C	9	P												
13	16	17	18	30	13	16	17	18	30																				
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)														
C	9	U													C	9													
13	16	17	18	30	13	16	17	18	30	(specify) Misc. State Permits																			
C. RCRA (Hazardous Wastes)															E. OTHER (specify)														
C	9	R													C	9													
13	16	17	18	30	13	16	17	18	30	(specify)																			

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

The mixing, blending and dispersing of colorants into printing inks and servicing of the printing industry.

F9: A
51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
Robert W. Gutheil, President		<i>Robert W. Gutheil</i>		11/17/80	
Borden Chemical					

COMMENTS FOR OFFICIAL USE ONLY

C																							
13	16											13	16										

FORM 3	EPA	ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER FOHDD00504374031
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FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr, mo., & day)	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)		2. NEW FACILITY (Complete item below.)			
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)		<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)			
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)		FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN			
YR.	MO.	DAY	YR.	MO.	DAY
8	5	03			
73	74	75	76	77	78
B. REVISED APPLICATION (place an "X" below and complete Item I above)		2. FACILITY HAS A RCRA PERMIT			
<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS		<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT			

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C														
DUP														
31														
15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31														
LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY					
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)						
X-1	S02	200	G		5									
X-2	S02	400	G		6									
1	S01	100000	G		7									
	S02	100000	G		8									
3					9									
4					10									

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES FOR DESCRIBING OTHER PROCESSES (code "T" FOR EACH PROCESS ENTERED HERE
INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)		D. PROCESSES							
	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))						
X-1	K	0	5	4	900	P		T	0	3	D	8	0		
X-2	D	0	0	2	400	P		T	0	3	D	8	0		
X-3	D	0	0	1	100	P		T	0	3	D	8	0		
X-4	D	0	0	2											included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY										
W O H D 0 0 5 0 4 3 7 4 0 3 1													W DUP 3 2 DUP										
DESCRIPTION OF HAZARDOUS WASTES (continued)																							
LINE NO.	A. EPA HAZARD WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)	D. PROCESSES													
										1. PROCESS CODES (enter)					2. PROCESS DESCRIPTION (if a code is not entered in D(1))								
	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45
1	K	0	8	6					P			S	0	1	S	0	2						
2																							
3																							
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26																							

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 1

EPA I.D. NO. (enter from page 1)														
5	4	3	2	1	0	9	8	7	6	5	4	T/A	C	
F	O	H	D	0	0	5	0	4	3	7	4	0	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6: $\frac{A}{2}$

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

N
F6: $\frac{56}{56}$

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)												LONGITUDE (degrees, minutes, & seconds)													
4 1 3 1 0 5 0												0 8 3 4 8 0 3 0													
65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90

VIII. FACILITY OWNER

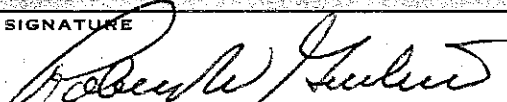
☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER												2. PHONE NO. (area code & no.)											
Borden Inc												614-225-4292											
3. STREET OR P.O. BOX												4. CITY OR TOWN											
180 E Broad St.												Columbus											
5. ST.												6. ZIP CODE											
OH												43215											

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Robert W. Gutheil, President Borden Chemical		4/17/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED